



# 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

**FROM:** Atlantic Striped Bass Advisory Panel

**DATE:** April 25, 2022

**SUBJECT:** Advisory Panel Recommendations on Draft Amendment 7 Options

The Atlantic Striped Bass Advisory Panel (AP) met via webinar on April 11 and April 20, 2022 to discuss AP recommendations on the options proposed in Striped Bass Draft Amendment 7. During the first webinar on April 11, AP members discussed preferred options for management triggers, recreational release mortality, and the rebuilding plan. During the second webinar on April 20, AP members discussed preferred options for conservation equivalency.

The following is a summary of AP members' recommended options and discussion from both webinars. There were differing recommendations among AP members for many issues.

### **April 11: AP Members in Attendance**

Louis Bassano (Chair, NJ recreational)  
Dave Pecci (ME for-hire/recreational)  
Bob Humphrey (ME comm. rod-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)  
Bob Danielson (NY recreational)  
Eleanor Bochenek (NJ fisheries scientist)  
Chris Dollar (MD fishing guide)  
Dennis Fleming (PRFC guide/processor/dealer)  
Bill Hall (VA recreational)  
Kelly Place (VA commercial)

### **April 20: AP Members in Attendance**

Louis Bassano (Chair, NJ recreational)  
Bob Humphrey (ME comm. rod-reel/for-hire)  
Patrick Paquette (MA rec/for-hire/comm)  
Andy Dangelo (RI for-hire)  
Eleanor Bochenek (NJ fisheries scientist)  
Chris Dollar (MD fishing guide)  
Charles (Eddie) Green (MD for-hire)  
Dennis Fleming (PRFC guide/processor/dealer)  
Bill Hall (VA recreational)  
Kelly Place (VA commercial)

*AP Nominee in attendance:* Jamie Lane (NC commercial)

*ASMFC Staff:* Emilie Franke, Katie Drew

*Jon Worthington (NC) provided preferred options via email, which are included in the summary.*

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## **Management Triggers (Section 4.1)**

### **Tier 1: F Triggers**

10 AP members support option A1 status quo: reduce F to target within 1 year

- The public is clearly indicating they want conservative management and do not want to extend timelines for taking action

5 AP members support option A2: reduce F to target within 2 years

- F is based on MRIP data so having more time to make adjustments makes sense considering the MRIP uncertainty and fluctuation of F from year-to-year
- There is a difference between taking action to get to the target vs. getting below the threshold; flexibility to allow more time to reach the target is acceptable
- It is difficult to implement regulations in one year for some states due to constraining timelines of regulatory processes
- Management stability is important and allowing two years would avoid the 'knee jerk' reaction the Board has been criticized for in the past

10 AP members support option B1 status quo: trigger trips if F exceeds threshold

- As soon as the overfishing threshold is crossed, the Board needs to take action
- The public is clearly indicating they want conservative management and do not want to extend timelines for taking action

5 AP members support option B2: trigger trips if 2-year average F exceeds threshold

- F is based on MRIP data so evaluating multiple years of data would help address concerns about MRIP uncertainty and fluctuation of F from year-to-year

Unanimous (14 AP members on the call) support option C1 status quo: trigger trips if F exceeds target for two years and SSB is below target for one of those years.

### **Tier 2: SSB Triggers**

Unanimous (14 AP members on the call) support option A2: 2-year deadline to implement rebuild plan

- Need to take action as quickly as possible to rebuild the stock
- The current management situation is due to the Board not implementing a rebuilding plan right away when the stock was first declared overfished

Unanimous (14 AP members on the call) support option B1 status quo: trigger trips if SSB is below threshold (overfished):

- As soon as the overfished threshold is crossed, need to act to bring SSB above threshold
- The public is clearly indicating they want conservative management

14 AP members support option C1 status quo: trigger trips if SSB is below target for two years and F is above target for one of those years.

1 AP member on the call supports option C3: no trigger for SSB target

- F is the only thing we can directly control, so the focus should be on the F target trigger and getting F to the target, not the SSB target trigger

### **General Target Trigger Recommendation**

13 AP members on the call recommend maintaining both target triggers (i.e., do not eliminate either the F or SSB target trigger):

- Although there may be a small numerical difference between target and threshold values at this point, the Board should keep both reference point triggers because the gap between the target and threshold may increase in the future; we should manage to the F target, which is below the threshold, to avoid unintended consequences resulting from variations in MRIP
- Having an F target trigger without an SSB target trigger is not enough since SSB could decline below the target due to factors besides fishing mortality (e.g., environmental conditions and recruitment)

*1 AP member supports removing the SSB target trigger (see Tier 2 option C3 above).*

### **Tier 3: Recruitment Trigger**

5 AP members support option A1 status quo: low sensitivity recruitment trigger:

- The status quo recruitment trigger has worked effectively as designed to trip when there is recruitment failure

7 AP members on the call support option A2: moderate sensitivity recruitment trigger

- Heard public support for the moderate sensitivity trigger that is more sensitive than the status quo but would not trip too often
- The current trigger is not sensitive enough considering recent observed low recruitment

3 AP members on the call support option A3: high sensitivity recruitment trigger

- There needs to be focus on recruitment and accounting for periods of low recruitment
- The YOY data are the most reliable predictor for the stock

6 AP members support option B1 status quo: Board determines management response if recruitment trigger trips (most flexible response):

- The Board should have flexibility to determine the course of action, especially considering the weak stock-recruit relationship for striped bass
- Caution about reacting to YOY data alone; it is more important to consider SSB data and mortality of the spawning stock to inform management action

9 AP members on the call support option B2: if recruitment trigger trips and F exceeds an interim F target calculated using the low recruitment assumption, reduce F to the target within one year (most conservative response):

- If we don't react and take action in response to low recruitment, we will end up in the same poor stock status situation in the future

#### **Tier 4: Deferred Management Action**

11 AP members on the call support option A status quo: no deferred management action:

- Heard from the public they want immediate action and no delays
- Even if SSB is above the target, there should still be no delay in taking action

3 AP members support options C and D: defer management action until the next assessment if the F target is tripped and SSB is above target (C) or SSB is projected to increase or remain stable over the next five years:

- These options would provide more stability for management and action would only be deferred if SSB is on a good trajectory

### ***Recreational Release Mortality (Section 4.2.2)***

#### **Option B. Seasonal Closures**

No support for option B1: state-specific two-week no-targeting closures:

- The benefits of seasonal closures are unclear and management issues (like different closures in different states) arising from closures may outweigh the benefits
- Some AP members recognize seasonal closures may be a tool for the future, but the options in Draft Amendment 7 are not developed enough and require more time for discussion and analysis
- Some AP members noted the benefit of closures for areas with warm water conditions

3 AP members on the call support option B2-a: no harvest in spawning areas from Jan-April:

- Closing spawning areas to harvest will decrease effort and provide protection to spawning fish
- One AP member noted concern about fishing pressure on pre-spawn fish in Raritan Bay

3 AP members on the call support option B2-b: no targeting on spawning grounds for two weeks in Mar-Apr or May-June:

- No one should be targeting spawning fish on spawning grounds

1 AP member commented specifically against option B1-c:

- Difficulty of identifying locations of all spawning grounds and the ineffectiveness of no-targeting closures

#### **Option C. Gear Restrictions**

8 AP members on the call support option C1: prohibit any device other than a non-lethal device to remove a striped bass from the water or assist in releasing:



4 AP members on the call support option C2: striped bass caught on any unapproved method of take must be returned to the water immediately without unnecessary injury:

- This is a common sense provision that aligns with existing gear restrictions

2 AP members commented specifically against option C2:

- Concern about the impacts of such a provision, such as requiring children and young anglers to release striped bass if incidentally caught
- Striped bass fisheries are very diverse with many different gear types and it would be difficult to implement such a provision since each state has different approved/unapproved methods of take

#### **Option D. Outreach and Education**

Unanimous (14 AP members on the call) recommendation from the AP to reconsider requiring outreach and education at a later date when the Board can clearly define what the required elements of state outreach will be in order to track state compliance:

- The AP recognizes the critical importance of outreach and education and supports state and organization outreach efforts, particularly to inform about the circle hook requirement and to educate the growing number of catch-and-release anglers
- The AP does support requiring states to conduct outreach and education, but Draft Amendment 7 does not provide enough information on those requirements
- The AP recommends the Board implement required outreach at a later time after specific outreach standards and required elements have been determined

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#### ***Rebuilding Plan (Section 4.4)***

##### **Recruitment Assumption for the 2022 Assessment**

3 AP members support both options A and B: use both the standard recruitment method (A) and the low recruitment assumption (B) for the 2022 assessment:

- Both recruitment methods should be used and the results of the different scenarios should be compared to inform management decision

6 AP members on the call support option B: use the low recruitment assumption for the 2022 assessment:

- Low recruitment assumption is the best approach considering the observed low recruitment in recent years

*Regarding recruitment, some AP members recommend additional studies to quantify the predation impacts on YOY striped bass in the Chesapeake Bay due to non-native blue catfish.*

##### **Process for Responding to the 2022 Assessment**

8 AP members on the call support option B: Board action (Board vote) to change management measures to achieve rebuilding, if needed:

- The Board should have the ability to take quicker action to rebuild the stock if necessary
  - AP members emphasized the importance of opportunities for public comment and AP input during this faster process
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### ***Conservation Equivalency (Section 4.6.2)***

#### **Option A: Status Quo Board Discretion**

8 AP members support option A Status Quo: Board discretion on the use of CE:

- Maintaining flexibility for states to tailor management based on unique conditions in their area is an important part of striped bass management; conditions and fisheries in each state are very different and CE is essential for management to be feasible.
- CE in the Chesapeake Bay has been successful in providing increased protection for striped bass through summer closures when striped bass habitat is extremely limited due to temperature and water quality conditions, and without CE this increased protection would not have been possible.
- Some CE programs reduce the number of recreational releases by allowing for different size limits, which can decrease the number of fish that need to be released to meet the size limit.

#### **Option B: CE Stock Status Restrictions**

3 AP members on the call support option B1-a: CE not allowed if the stock is overfished, and

2 AP members on the call additionally support option B1-c: CE not allowed if overfishing:

- Considering the uncertainty associated with CE programs and the difficulty of evaluating their effectiveness after implementation, the risk of CE should not be taken when the stock is in poor condition.

1 AP member commented specifically against option B1-c:

- The overfishing threshold should not be used as a basis to restrict CE due to the uncertainty associated with MRIP data, and therefore the uncertainty of determining whether overfishing is actually occurring (i.e., the point estimate of fishing mortality may be within a confidence interval).

2 AP members on the call support option B2-a: stock status restrictions for CE would also apply to the Hudson River, Delaware River, and Delaware Bay recreational fisheries.

#### **Option C: Precision Standard for MRIP PSE**

2 AP members on the call support option C2: PSE for MRIP data used in CE proposals cannot exceed 40:

- Although MRIP data have some level of imprecision, they are the only data available to use, so a 30 PSE limit would be too low; a 40 PSE limit would be more appropriate.

3 AP members on the call support option C3: PSE for MRIP data used in CE proposals cannot exceed 30:

- Uncertainty should be minimized and this aligns with NOAA’s warning about MRIP PSE levels.

#### **Option D: CE Uncertainty Buffer**

3 AP members on the call support option D1: uncertainty buffer of 25% for CE proposals for non-quota managed fisheries:

- The 25% buffer option is the right amount to manage risk; a 50% buffer is not needed but 10% would not be adequate.

2 AP members on the call support option D2: uncertainty buffer of 10% for CE proposals for non-quota managed fisheries:

- Ideally, the buffer would be between 10% and 25%, but 25% is too large so 10% is supported.

#### **Option E: Define Equivalency**

2 AP members on the call support option E2: CE proposals for non-quota-managed fisheries should demonstrate equivalency to the state-specific projection:

- There must be accountability for CE programs and states should be responsible for achieving their state-specific projected reduction.

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#### ***General Comments on Draft Amendment 7 Public Hearings***

AP members discussed the circumstances of virtual webinar hearings and the ability for people to provide comments/vote in polls at multiple hearings.

- One AP member noted concern about the bias of the virtual polling counts if some people submit votes multiple times, and these caveats should be clearly presented in the comment summary.
- One AP member noted some people may fish in multiple states and so may want to provide comments at multiple hearings.

#### ***Additional Comments***

The AP provided the following comments after receiving a summary of additional common topics raised during the public hearings:

- Some AP members noted support for conducting new recreational release mortality studies to inform management, ideally with estimates for different areas and/or seasons. One AP member noted the forthcoming results from the Massachusetts study on circle hooks and release mortality.
- One AP member supports additional studies on striped bass caught as bycatch.

- AP members recognized the concern about MRIP data and also recognized the challenges with improving data collection on such a large scale. One AP member recommended using revenue from fishing licenses to fund additional recreational sampling to supplement MRIP data.
- One AP member noted the striped bass fishery will always be a large fishery with a lot of effort, and although environmental factors do contribute to fishery declines, there must be management in place to ensure a healthy stock.



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## MEMORANDUM

**TO:** Atlantic Striped Bass Management Board

**FROM:** Law Enforcement Committee

**DATE:** April 25, 2022

**SUBJECT:** LEC Input on Striped Bass Draft Amendment 7 Options for Recreational Release Mortality

The Law Enforcement Committee (LEC) met via webinar on April 18, 2022 to provide input on the Striped Bass Draft Amendment 7 options addressing recreational release mortality. The LEC's input and recommendations are summarized below for each of the proposed options. These options are being considered for implementation in addition to the status quo circle hook requirement.

### ***Option B. Effort Controls (Seasonal Closures)***

The LEC emphasized previously discussed concerns that no-targeting closures would be unenforceable, particularly considering striped bass often overlap with other recreationally targeted species (e.g., bluefish) and enforcement cannot prove targeting intent. On the other hand, no harvest closures would be enforceable. For spawning closures, the LEC noted the closure areas should be clearly defined for implementation (i.e., determine specific boundaries and/or rivers for the closures).

### ***Option C. Additional Gear Restrictions***

For option C1, which proposes prohibiting any device other than a non-lethal device to remove a striped bass from the water or assist in releasing a striped bass, the LEC is concerned that the provided definition<sup>1</sup> of a non-lethal device is too broad. With such a broad definition, implementing this option as written would be difficult to enforce and could be confusing to anglers who use methods like spearfishing to target striped bass (where permitted in some states).

To improve enforceability, the LEC recommends being more specific, either by identifying which lethal devices are prohibited, or by identifying which non-lethal devices are permitted for use. If the Board's intent with this option is to prohibit gaffing specifically, the LEC recommends using the following language instead of the non-lethal device language: *It shall be unlawful for any person to gaff or attempt to gaff any striped bass at any time when fishing recreationally.*

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<sup>1</sup> As defined in Draft Amendment 7, a non-lethal device means any tool used in the removal of striped bass from the water or to assist in the releasing of striped bass that does not pierce, puncture, or otherwise cause invasive damage to the fish that may result in its mortality.

The above recommended language is based on Virginia's striped bass regulations regarding gaffs. Other examples of state regulations regarding gaffs and striped bass are included at the end of this memo for reference.

Regarding the approach of listing non-lethal devices that would be permitted to use, the LEC discussed an example of language in federal regulations for bringing sea turtles onboard (net or hoist required)<sup>2</sup>. However, the LEC concluded it may be difficult to sufficiently capture all non-lethal devices in such a list.

The LEC supports option C2, which would require striped bass caught on any unapproved method of take be returned to the water immediately without unnecessary injury. The LEC noted that making this a requirement for incidentally caught striped bass aligns with and strengthens gear restrictions.

#### ***Option D. Outreach and Education***

The LEC supports outreach and education efforts to help increase compliance with regulations. However, the LEC noted the outreach options in Draft Amendment 7 do not provide specific details on how or what type of outreach would be conducted. Related to circle hooks, at a previous meeting in December 2021 the LEC recommended conducting outreach to manufacturers to address questions about what qualifies as a circle hook.

#### ***Shared Water Bodies or Neighboring States***

The LEC highlighted the importance of consistent regulations in shared waterbodies and among neighboring states. Different regulations between two neighboring states presents special enforcement challenges, and are often confusing to anglers.

#### ***Examples of Existing Gaff Regulations for Striped bass***

The following are some examples of existing state regulations regarding striped bass and the use of gaffs:

- Maine: *It is unlawful to use a gaff to land any striped bass.*
- New Hampshire: *The taking of striped bass by gaffing shall be prohibited.*
- Connecticut: *Striped bass may only be taken by angling (spearing is prohibited) and the use of a gaff in the taking of striped bass is prohibited.*
- Virginia: *It shall be unlawful for any person to gaff or attempt to gaff any striped bass at any time.*

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<sup>2</sup> Title 50 Chapter VI Part 622 Appendix F Sea Turtle Release Gear: One approved net or hoist is required on board. These devices are to be used to facilitate safe handling of sea turtles by allowing them to be brought on board for fishing gear removal, without causing further injury to the animal. Sea turtles must not be brought on board without the use of a net or hoist.



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## MEMORANDUM

**TO:** Atlantic Striped Bass Management Board

**FROM:** Emilie Franke, FMP Coordinator

**DATE:** April 26, 2022

**SUBJECT:** Public Comment Summary on Draft Amendment 7

The following is an overview of all comments received by ASMFC on Draft Amendment 7 to the Atlantic Striped Bass Fishery Management Plan as of April 15, 2022 (closing deadline).

A total of 4,689 comments were received on Draft Amendment 7 from individual comments, organizations, and form letters. A total of 51 organizations submitted comments; one organization's letter also listed 8 supporting organization signatories and 84 supporting business signatories. A total of 3,397 comments were received through 25 form letters<sup>1</sup>. The remainder of comments (1,149) came from individual comments including from private anglers, charter captains, commercial fishermen, and concerned citizens.

12 public hearings were held for 11 jurisdictions from March 8-March 29, 2022. 8 hearings were conducted via webinar only: Maine, Massachusetts, Rhode Island, Connecticut, New Jersey-Pennsylvania, Delaware, Maryland, Virginia. 3 public hearings were conducted in-person: New York (Kings Park), New York (New Paltz), Potomac River Fisheries Commission-District of Columbia. 1 hearing was conducted in a hybrid format with attendees participating via webinar and in-person: New Hampshire.

493 individuals (not including state staff, ASMFC staff, or Commissioners/Proxies) attended the hearings and some of these individuals attended multiple hearings. Live polls or a show-of-hands vote were used at most hearings for some of the proposed options; the tables indicate when a poll or vote was used.

The following pages include comment tables summarizing written and hearing comments for each option proposed in Draft Amendment 7. There is also a list of other topics/themes commonly raised in the comments. The summary tables are followed by the letters and emails sent by organizations, form letters with total submissions count, and individual comment letters and emails. The public hearing summaries and attendee lists are provided as a separate attachment included in the 2022 Spring Striped Bass Board main meeting materials.

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<sup>1</sup> Form letters (more than 3 of the same comment) include comments stating support for an organization's comments; however, if the commenter provided additional comments/rationale related to management beyond the organization's or letter's comments, then it was considered an individual comment.

**Public Comment Summary Tables**

**Table 0. Comment Count**

Number of written comments received by individuals, organizations, and form letters, and number of people who attended and participated in the polls/provided comments for each public hearing

<b>Written Public Comments Received</b>		
Individual Comments		1,149
Form Letters		3,397 <sup>^</sup>
Organizations		51
Org/Business Signatories <sup>+</sup>		92
<i>TOTAL</i>		4,689
<b>Public Hearing</b>	<b># Public Attendees*</b>	<b># Poll Participants/ Commenters**</b>
Maine	68	54
New Hampshire	29	23
Massachusetts	91	62
Rhode Island	31	25
Connecticut	39	29
New York (Kings Park)	36	36
New York (New Paltz)	46	40
New Jersey-Pennsylvania	88	78
Delaware	19	14
Maryland	72	55
PRFC-DC	14	14
Virginia	42	28
<i>TOTAL</i>	<i>575*</i>	<i>458**</i>

<sup>^</sup> 25 different form letters received.

<sup>+</sup> One organization's letter also listed 8 supporting organization signatories and 84 supporting business signatories, which are categorized as Signatories (subset of Organizations).

\*Some people attended multiple hearings. **493 unique public attendees** attended the public hearings. Public attendees do not include state staff, ASMFC staff, or Commissioners/Proxies.

\*\* Some individuals and organizations participated in polls at multiple hearings and/or provided verbal comments at multiple hearings.



## MANAGEMENT TRIGGERS

### Section 4.1

**Table 1. Tier 1: Fishing Mortality (F) Triggers**

Number in support for F trigger options

*NOTE: For each set of options, sub-options 1-2-3 are mutually exclusive.*

	Reduce F to the target		F threshold trigger		F target trigger		
	A1. Within 1 year SQ	A2. Within 2 years	B1. F > threshold SQ	B2. 2-yr avg F > threshold	C1. F > target for 2 years and SSB < target SQ	C2. F > target for 3 consec. years	C3. No trigger for F target
Individual	642	9	610	5	611	2	1
Form Letter	3,357	6	3,357	6	3,349		6
Organization	33	10	34	6	34	6	
Signatories	92		92		92		
<b>Written Total</b>	<b>4,124</b>	<b>25</b>	<b>4,093</b>	<b>17</b>	<b>4,086</b>	<b>8</b>	<b>7</b>
<i>Hearings</i>	*	*					
ME	38	5	26		26		
NH	17	2	8		6		
MA	34	10	5		5		
RI	14	1	4	1	4		1
CT	16	1	3		3		
NY Kings Park	31	5	6		5		
NY New Paltz	11	22					
NJ-PA	25	18					
DE	7	5					
MD	29	10					
PRFC-DC		1					
VA	4	2	4		4		
<b>Hearing Total</b>	<b>226</b>	<b>82</b>	<b>56</b>	<b>1</b>	<b>53</b>		<b>1</b>

*\*Poll/show of hands conducted at hearings except for PRFC-DC and VA hearings.*

Most comments favored the status quo reducing F to the target within 1 year if an F trigger is tripped (A1). Most comments favored the status quo F trigger definitions: B1-the threshold trigger tripping if F exceeds the threshold in one year (overfishing is occurring); C1-the target trigger tripping if F exceeds the target in two consecutive years in combination with SSB being below the target in one of those years. Many comments noted the status quo triggers are adequate and the Board must respond promptly to triggers by taking action to reduce F within 1 year.

**Table 2. Tier 2: Spawning Stock Biomass (SSB) Triggers**

Number in support for SSB trigger options

*NOTE: For each set of options, sub-options 1-2-3 are mutually exclusive.*

	Deadline to have rebuilding plan		SSB threshold trigger		SSB target trigger		
	A1. No deadline: SQ	A2. 2-yr deadline:	B1. SSB < threshold SQ	B2. No trigger for SSB threshold	C1. SSB < target for 2 years and F > target SQ	C2. SSB < target for 3 consec. years	C3. No trigger for SSB target
Individual	2	626	608	1	573	9	16
Form Letter	6	3,348	3,348	6	2,864	257	225
Organization	5	35	38	2	21	9	10
Signatories		92	92		92		
<b>Written Total</b>	<b>13</b>	<b>4,101</b>	<b>4,086</b>	<b>9</b>	<b>3,550</b>	<b>275</b>	<b>251</b>
<i>Hearings</i>							
ME		24	26		22	4	
NH		8	8			6	
MA		1	5		5		
RI		5	5		3		1
CT		3	2		1	1	
NY Kings Park		4	6		5		
NY New Paltz							
NJ-PA							
DE							
MD							
PRFC-DC							
VA		4	4		4		
<b>Hearing Total</b>	<b>0</b>	<b>49</b>	<b>56</b>	<b>0</b>	<b>40</b>	<b>11</b>	<b>1</b>

Most comments favored adding a two-year deadline for putting a rebuilding plan in place if an SSB trigger trips (A2). Most comments favored the status quo SSB trigger definitions: B1-the threshold trigger tripping if SSB is below the threshold (stock is overfished); C1-the target trigger tripping if SSB is below the target in two consecutive years in combination with F being above the target in one of those years. Many comments noted the status quo triggers definitions are adequate and both the target and threshold triggers should be maintained. There were some comments supporting either changing the target trigger to only consider SSB levels (C2) or eliminating the target trigger (C3).

Many comments noted the Board should have designated a formal rebuilding plan more quickly after the last assessment, and so would support a 2-year rebuilding plan deadline (A2).

**Table 3. Tier 3: Recruitment Trigger**

Number in support for recruitment trigger options

NOTE: For each set of options, sub-options 1-2-3 are mutually exclusive.

	Recruitment Trigger Definition			Recruitment Trigger Response		
	A1. Low Sensitive SQ	A2. Moderate Sensitive	A3. High Sensitive	B1. Most Flexible: Board determines action SQ	B2. Most Conservative: reduce if F > F target—low recruitment	B3. Moderately Conservative: reduce if F trigger trips using F—low recruitment
Individual	3	456	147	6	593	2
Form Letter	6	856	2,492	6	3,348	
Organization	5	23	11	4	35*	
Signatories		92			92	
<b>Written Total</b>	<b>14</b>	<b>1,427</b>	<b>2,650</b>	<b>16</b>	<b>4,068</b>	<b>2</b>
<i>Hearings</i>						
ME		7			7	
NH		6			8	
MA		4			4	
RI		4		1	4	
CT		2	1		3	
NY Kings Park		2	1		5	
NY New Paltz						
NJ-PA						
DE						
MD						
PRFC-DC						
VA		4			4	
<b>Hearing Total</b>	<b>0</b>	<b>29</b>	<b>2</b>	<b>1</b>	<b>35</b>	<b>0</b>

\*5 organizations support a modified version of option B2 described below.

Most comments favored the high sensitivity trigger (A3) followed by support for the moderate sensitivity trigger (A2). Most comments favored the most conservative management response if the recruitment trigger is tripped (B2), which would require comparing F in the most recent year to an interim F calculated using the low recruitment assumption; if F is below that interim F target, then F must be reduced to the target within 1 year. Many commenters noted the importance of a more sensitive trigger and responding to low recruitment could help mitigate future stock declines by responding early. Many noted support for the most conservative approach. Some organizations would support a modified B2 option where the Board would make that comparison of F against F interim target (and consider action if needed) during the next stock assessment instead of when the recruitment trigger trips, which would avoid responding to the recruitment trigger between stock assessments.

**Table 4. Tier 4: Deferred Management Action**

Number in support for deferred management action options

*NOTE: The Board can select more than one option for options B through F.*

	A. No Deferred Management Action SQ	B. Defer if <3 years since last action	C. Defer if F target trips and SSB > target	D. Defer if F target trips and SSB will increase/stable over 5 years	E. Defer if F target trips and 75% chance SSB > threshold over 5 years	F. Defer if action initiated in response to another trigger
Individual	612	4	3	3	2	6
Form Letter	3,341					14
Organization	35	7	3	2	3	3
Signatories	92					
<b>Written Total</b>	<b>4,080</b>	<b>11</b>	<b>6</b>	<b>5</b>	<b>5</b>	<b>23</b>
<i>Hearings</i>	*	*		*		*
ME	32	4		4		5
NH	12	1		4		2
MA	29	6		5		4
RI	13	2		1		1
CT	12			1		4
NY Kings Park	28	6		6		6
NY New Paltz	2			13		1
NJ-PA	31	7		9		8
DE	8	3		2		2
MD	20	7		8		8
PRFC-DC		1				
VA	13	6		4		3
<b>Hearing Total</b>	<b>200</b>	<b>43</b>		<b>57</b>		<b>44</b>

*\*Poll/show of hands conducted at hearings except for PRFC-DC hearing.*

Most comments favored the status quo no deferred management action (Option A), which requires the Board to respond to a management trigger when it is tripped. Commenters noted the need for the Board to respond immediately to management triggers to remain accountable and not delay action.

Comments favoring deferred action in some cases included comments across options B through D with commenters noting the importance of flexibility in the management program and the need to consider factors like how long management measures have been in place.

## RECREATIONAL RELEASE MORTALITY

### Section 4.2.2

**Table 5. Recreational Release Mortality**

Number in support for measures to address recreational release mortality  
(in addition to the status quo hook requirement)

*NOTE: The Board can select one or more of sub-options under Options B through D that would be implemented in addition to the existing circle hook requirement (Option A status quo). D1 and D2 are mutually exclusive.*

	Seasonal Closures			Gear Restrictions		Outreach	
	B1. States closed to targeting for 2 weeks	B2-a. Spawning areas closed to harvest for Jan-Apr	B2-b. Spawning grounds closed to targeting for 2 weeks	C1. Prohibit devices other than non-lethal devices	C2. Release incidental catch if caught on unapproved method of take	D1. Require Outreach	D2. Recommend Outreach
Individual	25	136	123	592	554	201	417
Form Letter	73	2,775	300	864	858	2,787	552
Organization	4	13	11	36	32	21	15
Signatories				92	92		92
<b>Written Total</b>	<b>102</b>	<b>2,924</b>	<b>434</b>	<b>1,584</b>	<b>1,536</b>	<b>3,009</b>	<b>1,076</b>
<i>Hearings</i>	*	*	*	*	*		
ME	6	31	21	45	37	4	5
NH	4	5	5	17	13		2
MA	8	29	26	42	35	4	4
RI	2	5	4	17	12	4	3
CT	3	12	14	20	14		1
NY Kings Park				3	3	2	1
NY New Paltz		2	2	39	39	4	
NJ-PA	6	25	19	55	30	3	1
DE	1	9	5	9	7		
MD	18	36	15	39	24	5	
PRFC-DC							
VA	11	18	10	24	16	5	
<b>Hearing Total</b>	<b>59</b>	<b>172</b>	<b>121</b>	<b>310</b>	<b>230</b>	<b>31</b>	<b>17</b>

*\*Poll/show of hands conducted at hearings except for NY (Kings Park) and PRFC-DC hearings.*

Of the seasonal closure options, spawning area closures prohibiting harvest of striped bass for January through April (B2-a) was the most supported closure option. Some commenters also noted that spawning closures should include closures in staging areas for pre-spawn fish.

Of the seasonal closure options, statewide seasonal closures prohibiting targeting of striped bass for two weeks in each state (B1) was the least supported option. Some commenters noted they would support statewide closures if they were no-harvest closures. If closures were implemented, some commenters noted closures should occur during the summer months.

Some comments (including many comments at the public hearings) noted specific opposition to the seasonal closure options, particularly opposition to no-targeting closures, due to enforcement concerns, negative economic impacts, especially for northern states with shorter seasons, and the inability to quantify the reduction achieved from implementing closures. There were also several comments noting specific opposition to closures in the Hudson River. Some comments noted that closures could be considered in the future but there is not enough information or data to inform that consideration now.

There was support for both gear restriction options to prohibit any device other than non-lethal devices to assist in removing/releasing striped bass (C1) and require the release of striped bass incidentally caught on an unapproved method of take (C2). At the public hearings in particular, there were many more comments in support of gear restrictions as compared to comments in support of seasonal closures.

Commenters expressed support for outreach and education efforts on best handling and release practices with most comments in support of requiring outreach (D1) and some in support of recommended outreach (D2). Commenters noted that outreach and education is one of the most important strategies and should be prioritized, including partnerships with industry and businesses on outreach campaigns.

#### ***Other Comments Related to Recreational Release Mortality***

Some comments noted concern that MRIP data is not accurate and is associated with high uncertainty, and concern that the 9% recreational release mortality estimate used for striped bass is outdated and not representative of what is happening on the water. Some commenters recommended new recreational release mortality studies be conducted and they should include state-specific, region-specific, and/or sector-specific release mortality estimates. Some commenters note that release mortality differs within the recreational sector.

Some comment noted support for additional gear restrictions including requiring barbless hooks and banning treble hooks.

## REBUILDING PLAN

### Section 4.4

**Table 6. Rebuilding Plan**

Number in support for rebuilding plan options

*NOTE: For each set of options, A and B are mutually exclusive.*

	Recruitment Assumption for 2022 Assessment		Board Response to 2022 Assessment (if reduction needed)	
	A. Standard Recruitment Method SQ	B. Low Recruitment Assumption	A. Addendum process SQ	B. Board Action process
Individual	5	585	6	588
Form Letter	6	3,341	6	3,333
Organization	1	34	2	34
Signatories		92		92
<b>Written Total</b>	<b>12</b>	<b>4,052</b>	<b>14</b>	<b>4,047</b>
<i>Hearings</i>	*	*	*	*
ME	9	30	6	31
NH	1	17	3	13
MA		8	3	6
RI	3	16	1	17
CT	3	18	3	19
NY Kings Park		3		5
NY New Paltz	36	3	37	3
NJ-PA	26	29	20	30
DE	4	5	4	5
MD	19	22	21	21
PRFC-DC	3		1	1
VA	10	14	8	13
<b>Hearing Total</b>	<b>114</b>	<b>165</b>	<b>107</b>	<b>164</b>

*\*Poll/show of hands conducted at hearings except for MA, NY (Kings Park), and PRFC-DC hearings.*

A majority of comments favored the using the low recruitment assumption (B) for the 2022 assessment in order to take the most conservative approach to rebuild the stock and acknowledging recent low recruitment support for the most conservative, aggressive rebuilding plan. A majority of public hearing comments favored using the Board action (Board vote) process (B) to respond to the 2022 assessment if a reduction is needed to achieve rebuilding. Commenters noted the importance of taking quick action to address the urgent need to rebuild the stock and also noted that public comment should incorporated into the process as much as possible. There were some comments in support of the status quo Addendum process (A) and these commenters noted the importance of a thorough public comment process and sufficient time for analysis before selecting new measures.

## CONSERVATION EQUIVALENCY

### Section 4.6.2

**Table 7. General CE Option Categories**

Number in support of CE Option Categories A-E

*NOTE: The Board can select sub-options from multiple option categories B through E*

	A. Board discretion on CE SQ	B. Stock Status Restrictions	C. MRIP PSE Standard	D. Uncertainty Buffer for Non-Quota Managed	E. Define Equivalency for Non-Quota Managed
Individual	11	630	573	579	555
Form Letter	33	3,348	864	864	656
Organization	8	34	34	33	29
Signatories		92	92	92	92
<b>Written Total</b>	<b>52</b>	<b>4,104</b>	<b>1,563</b>	<b>1,568</b>	<b>1,332</b>
<i>Hearings</i>	*	*	*	*	*
ME	2	25	14	18	16
NH	1	10	7	7	7
MA	4	7	4	4	7
RI	1	14	6	8	6
CT	3	17	12	12	12
NY (Kings Park)		3	2	2	3
NY (New Paltz)	32	1	1	1	1
NJ-PA	20	21	9	12	10
DE	4	8	5	6	6
MD	13	21	14	13	15
PRFC-DC	14				
VA	7	15	13	13	4
<b>Hearing Total</b>	<b>101</b>	<b>142</b>	<b>87</b>	<b>96</b>	<b>87</b>

*\*Poll/show of hands conducted at hearings except for NY (Kings Park) and MA hearings.*

Most comments favored restricting the use of CE based on stock status (B). There were also many comments in support of restrictions on PSE for MRIP data used in CE proposals (C), uncertainty buffers for CE programs for non-quota managed recreational fisheries (D), and defining equivalency for CE programs for non-quota recreational fisheries (E). Those in favor of restricting CE (B-E) noted concerns about how CE has been used in the past and the high uncertainty of implementing alternative measures, especially when the stock is in poor condition. Some comments support removing CE entirely from the management plan.

Those in favor of Board discretion (A) noted the importance of CE as to address the unique needs of different states/regions and sectors along the coast to make management feasible.



**Table 8. CE Option B. Stock Status Restrictions**  
 Number in support for CE stock status restriction options

*NOTE: Sub-options B1-a and B1-b are mutually exclusive; sub-option B1-c can be selected in addition to or exclusively from B1-a or B1-b. The Board can select more than one of sub-options B2-a, B2-b, and B2-c.*

	No CE if...			Stock status restrictions would also apply to...		
	B1-a. stock overfished (below threshold)	B1-b. SSB is below target	B1-c. overfishing is occurring	B2-a. Hudson River, DE Bay, DE River	B2-b. Quota-managed rec: bonus programs	B2-c. commercial
Individual	627	4	86	18	50	7
Form Letter	3,348		321		73	
Organization	34	2	19	4	10	2
Signatories	92					
<b>Written Total</b>	<b>4,101</b>	<b>6</b>	<b>426</b>	<b>22</b>	<b>133</b>	<b>9</b>
<i>Hearings</i>						
ME	18		5			
NH	2					
MA	4					
RI	5		2	1		
CT	4					
NY Kings Park	3		1		1	
NY New Paltz						
NJ-PA						
DE	2					
MD						
PRFC-DC						
VA*	11	3	12	5	9	6
<b>Hearing Total</b>	<b>49</b>	<b>3</b>	<b>20</b>	<b>6</b>	<b>10</b>	<b>6</b>

*\*Poll conducted at VA hearing only.*

Most comments favored not allowing CE if the stock is overfished (B1-a) and some comments also favored not allowing CE if the stock is experiencing overfishing (B1-c). Those types of restrictions would by default apply to non-quota managed recreational fisheries except for the Hudson River, Delaware River, and Delaware Bay. There were few comments overall supporting options to extend those restrictions. Of those that did support options to extend restrictions, most comments supported extending those restrictions to recreational bonus programs (B2-b).

**Table 9. CE Sub-Options**

**Option C. Stock Status Restrictions, Option D. Uncertainty Buffer, Option E. Define Equivalency**  
 Number in support for CE sub-options for C through E

*NOTE: For each set of options, sub-options 1-2-3 are mutually exclusive.*

	PSE Standard for MRIP Data in CE Proposals			Uncertainty Buffer for Non-Quota Recreational Fisheries			Define Equivalency for Non-Quota Recreational Fisheries	
	C1. 50 PSE limit	C2. 40 PSE limit	C3. 30 PSE limit	D1. 10% buffer	D2. 25% buffer	D3. 50% buffer	E1. Coast projection	E2. State projection
Individual	2	1	568	24	424	130	3	552
Form Letter			864	225	611	28		656
Organization			34	6	17	10	1	28
Signatories			92		92			92
<b>Written Total</b>	<b>2</b>	<b>1</b>	<b>1,558</b>	<b>255</b>	<b>1,144</b>	<b>168</b>	<b>4</b>	<b>1,328</b>
<i>Hearings</i>								
ME			8		8			8
NH			2		2			2
MA			1		1			4
RI			5	1	4			2
CT			4		3	1		4
NY Kings Park			2		2			3
NY New Paltz								
NJ-PA								
DE			2		2			2
MD								
PRFC-DC								
VA*	1		12	2	7	4		4
<b>Hearing Total</b>	<b>1</b>	<b>0</b>	<b>36</b>	<b>3</b>	<b>29</b>	<b>5</b>	<b>0</b>	<b>29</b>

*\*Poll conducted at VA hearing only.*

For the PSE standard for MRIP data used in CE proposals, most comments favored the most restrictive PSE limit of 30 (C3). Many commenters noted the need to align with NOAA guidance on MRIP PSE levels. For the uncertainty buffers for non-quota managed recreational fisheries, most comments favored the 25% buffer (D2). There were also some comments supporting either the 10% buffer (D1) or the 50% buffer (D3). For the definition of equivalency for non-quota managed recreational fisheries, most comments favored using the state-specific projection for CE proposals (E2) noting the importance of accountability and concern about Addendum VI CE programs that were based off the coastwide projected reduction.

## **ADDITIONAL TOPICS RAISED AT THE PUBLIC HEARINGS**

In addition to comments on the specific options, the following topics/themes were commonly raised by commenters. Due to the breadth of comments, this overview does not represent the entirety of topics addressed in the comments.

Additional common themes/topic raised during the hearings included:

- Need for more enforcement and/or higher penalties; concern about poaching
- Seasonal closures should also be considered for the commercial sector
- Importance of protecting large spawning fish
- Consider changing slot limits over time to protect year classes and allow fish to spawn before they are harvested
- Support for managing striped bass for abundance
- Support for making striped bass a gamefish (recreational only) and/or support for a harvest moratorium until the stock recovers
- Concern about menhaden harvest in the Chesapeake Bay
- Concern about the complexity of Draft Amendment 7 and the need for an executive summary to better communicate the issues and facilitate public comment

**Comments were submitted by the following groups and organizations:**

American Saltwater Guides Association	Native Fish Coalition, Maine
American Sportfishing Association	New Jersey Council of Diving Clubs
Annapolis Anglers Club	Northeast Charterboat Captains Association
Backcountry Hunters and Anglers:	New York Coalition for Recreational Fishing
Capital Chapter	New York State Conservation Council
New England Chapter	North Brookhaven Sport Fisherman Club (NY)
New Jersey Chapter	North Fork Anglers Fishing Club
New York Chapter	Plum Island Surfcasters
North Carolina Chapter	Recreational Fishing Alliance
Pennsylvania Chapter	Rhode Island Party and Charter Boat Association
Berkeley Striper Club (NJ)	Rhode Island Saltwater Anglers Association
Cape Cod Charter Boat Association	Save the Bay
Carver Sportsmen's Club (MA)	South Shore Fly Casters
Center for Sportfishing Policy	Stellwagen Bank Charter Boat Association
Chesapeake Bay Foundation	Stripers Forever
Coastal Conservation Association, National	Tightlined Conservation Coalition
Coastal Conservation Association, New Hampshire	The Nature Conservancy
Congressional Sportsmen's Foundation	Theodore Roosevelt Conservation Partnership
Connecticut Catch and Release Fly Fishing Facebook Group	Traditional Surfcasters
Connecticut Surfcaster's Association	Twin Rivers Waterman's Association
Fly Fishers International	Virginia Anglers Club
Hi-Mar Striper Club of Middletown, NJ	Virginia Saltwater Sportfishing Association
Hudson River Fishermen's Association	Virginia Waterman's Association
Kennebunkport Conservation Trust	Wild Oceans
Maine Association of Charterboat Captains	
Maryland Charter Boat Association	
Massachusetts Striped Bass Association	
Native Fish Coalition, Massachusetts	

**Comments were submitted via the following form letters:**

Chesapeake Bay Foundation (2,461)  
Backcountry Hunters and Anglers (251)  
American Sportfishing Association (217)  
Virginia Saltwater Sportfishing Association (73)  
Maryland Charter Boat Association (27)  
Wild Oceans (23)  
American Saltwater Guides Association (18)  
*[support for]*  
CCA Maryland *[support for]* (8)

Form Letters from unknown sources:

Form Letter 1 (141)  
Form Letter 2 (33)  
Form Letter 3 (31)  
Form Letter 4 (23)  
Form Letter 5 (9)  
Form Letter 6 (9)  
Form Letter 7 (8)  
Form Letter 8 (8)  
Form Letter 9 (8)  
Form Letter 10 (8 *ME anglers*)  
Form Letter 11 (7 *CT anglers*)  
Form Letter 12 (7 *NJ anglers*)  
Form Letter 13 (6)  
Form Letter 14 (6)  
Form Letter 15 (5)  
Form Letter 16 (5)  
Form Letter 17 (5)



April 12, 2022

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

Dear Ms. Franke,

On behalf of America's 7.5 million striped bass anglers and the sportfishing industry, we appreciate the opportunity to provide comments to the Atlantic States Marine Fisheries Commission (ASMFC) regarding Draft Amendment 7 to the Atlantic Striped Bass Interstate Fishery Management Plan.

Recreational anglers and the sportfishing industry recognize that a healthy striped bass population and fishery is critical to the east coast outdoor recreational economy and is a significant driver of angler engagement and participation along the Atlantic coast. While the population is significantly healthier than it was when the moratorium was enacted in the 1980s, recent declining trends in the population and its fishery continue to be a cause for concern. However, the sportfishing community stands by the cooperative process of the ASMFC and believes that the states and its stakeholders can rebuild the striped bass fishery together again.

To help assist ASMFC in taking final action on Amendment 7 for Atlantic striped bass that is responsible to the resource and its fisheries, we submit the following comments for Board review.

Section 4.1 Management Triggers (pg. 44)

Tier 1: Fishing Mortality Management Triggers (pg. 46)

Option A: Timeline to Reduce F to the Target – this is the amount of time allowed for management to respond after a fishing mortality trigger is tripped.

**Recommendation and Justification:**

- We support Sub-option A1 (status quo) 1 year.
- Management action can be accomplished in one year through ASMFC's addendum process while providing the opportunity for public input on potential management changes.

Option B: F Threshold Trigger – identifies an overfishing determination and management response.

**Recommendation and Justification:**

- We support Sub-option B1 (status quo) If F exceeds the threshold in a single year, action must occur to reduce F to the target within timeframe selected under sub-option A (supported A1 above).
- We support managing to F target so if the threshold is reached management response should be immediate to reduce F to the target.

Option C: F Target Triggers – this is a trigger to maintain F at or below the target level.

**Recommendation and Justification:**

- We support Sub-option C1 (status quo) if F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, must reduce F to a level that is at or below the target within the timeframe selected under sub-option A (supported A1 above).
- Again, we support managing to F target and including an evaluation of SSB as part of the F target trigger to address both the F and SSB target triggers.

Tier 2: Female Spawning Stock Biomass Management Triggers (pg. 47)

Option A: Deadline to Implement a Rebuilding Plan – this is the amount of time to establish a rebuilding plan.

**Recommendation and Justification:**

- We support Sub-option A2: Two-Year Deadline to implement a rebuilding plan when SSB trigger trips.
- Controlling F is the rebuilding plan. Establishing a two-year deadline will clarify that fact and relate it to a specific timeline.

Option B: SSB Threshold Trigger – identifies an overfished determination and management response.

**Recommendation and Justification:**

- We support Sub-option B1 (status quo) Rebuild when SSB in a single year falls below the threshold.
- We support managing to SSB target so if the threshold is reached management response to begin rebuilding should be immediate. Again, management response is to control F.

Option C: SSB Target Triggers – this trigger determines when action is required based on the SSB target level.

**Recommendation and Justification:**

- We support Sub-option C3. No management trigger related to SSB target.
- Using the F target trigger, managers will be taking precautionary action to achieve SSB target consistent with objective 1 of the FMP (pg. 29). Controlling F is the only mechanism within the ASMFC toolbox to increase SSB if fishing mortality is driving the population.
- The reference points are linked, meaning maintaining F target achieves SSB target over time. If F target is maintained and SSB continues to decline below its target, then that is likely a recruitment issue which is addressed with the recruitment trigger (next topic, tier 3 recruitment trigger).
- If SSB is declining because F target is being exceeded, then the F target trigger will address that because it has an SSB target component (see F target trigger in tier 1 above).

Tier 3: Recruitment Triggers (pg. 48)

Option A: Recruitment Trigger Definition – this trigger is designed to identify extended periods of low recruitment.

**Recommendation and Justification:**

- We support Sub-option A2: Moderate Sensitivity Recruitment Trigger.
- Looking at [table 2 on page 50](#), it's clear there were extended periods of below average recruitment (e.g., 2005-2009) that would be better identified with Sub-option A2.

## Option B: Management Response to Recruitment Trigger

### **Recommendation and Justification:**

- We support a variation of Sub-option B2. The Board implements an interim F target calculated using the low recruitment assumption, and then during the next stock assessment, it evaluates F against the new interim F target and simultaneously evaluates all the other management triggers to determine if action is needed.
- This avoids logistical challenges of responding to the recruitment trigger between stock assessments and aligns management response with all the other management triggers.
- This approach also eliminates the potential for annual changes to management measures if the recruitment trigger were to trip between assessments which aligns with objective 6 of the FMP.

### Tier 4: Deferred Management Action (pg. 53)

We view this section as the opportunity to take a step back and think holistically about how all these management triggers work together to provide a logical management program for striped bass that's consistent with the goal and objectives of the FMP.

### **Recommendation and Justification:**

- We support Option A. No deferred management action. Management response follows stock assessments.
- Aligning management response to the recruitment trigger with all the other management triggers commits the Board to take action when needed based on results of stock assessments.
- The management triggers we support are precautionary, and we must balance that with allowing the most recent management changes the opportunity to have a positive impact on the stock.
- Therefore, stock assessments following a management change should be scheduled to enable evaluation of two fishing years under the new management measures, providing an opportunity for the population to react to the corrective management action while creating management stability for two years.

Section 4.2.2 Measures to Address Recreational Release Mortality (pg. 56) – The popularity of catch and release fishing for striped bass, combined with strict size and bag regulations, creates a very high proportion of fish being released. [Table 12, pg. 129](#) shows that release mortality now accounts for the highest percent of total removals since 2017. Currently, the only measure to address release mortality is a requirement to use circle hooks when recreationally fishing for striped bass with bait. To further address release mortality, Amendment 7 considers seasonal closures, gear restrictions, and outreach and education.

Option B (pg. 59): Seasonal Closures – the intent of these closures is to reduce the number of fishing trips for striped bass.

### **Recommendation and Justification:**

- We support Sub-options B2 Spawning Area Closures.
- We support thoughtful closures to protect spawning fish but urge the Board to be mindful of the economic benefits of spring fisheries. When closures occur, they need to apply to both sectors to maximize benefits.
- If no-targeting closures are used, they need to be measurable and justified, and given difficulties with enforceability, states need to educate anglers about the purpose and intent of the no-targeting closure.



Option C (pg. 64): Additional Gear Restrictions – besides the use of circle hooks, this option considers allowing only nonlethal devices to remove striped bass from the water and clarifies that if you accidentally catch a striped bass while fishing with a baited J-hook (targeting fluke for example), the striped bass must be released.

**Recommendation and Justification:**

- We support Sub-options C1 and C2. Approximately 90% of striped bass are released which supports the use of nonlethal devices to remove them from the water, but we are concerned that sub-option C1 is vague, and similar vagueness on circle hooks created significant implementation challenges in Addendum VI.

Option D (pg. 64): Outreach and Education – ASMFC should focus on education and outreach to address release mortality because this issue is difficult to control through regulation as discussed.

**Recommendation and Justification:**

- We support Sub-option D1. States are required to promote best striped bass handling and release practices by developing campaigns.
- We previously worked with industry partners to develop education and outreach materials on best handling practices and made those materials available to all the states and across our recreational fishing community. Under this requirement, states should work with industry to continue these education and outreach campaigns.

Section 4.4 Rebuilding Plan (pg. 67) – To address the overfished status, the Board must adjust striped bass management to rebuild SSB to the target level no later than 2029.

Section 4.4.1 Recruitment Assumption for Rebuilding Calculation (pg. 67) – Technical analysis of the recruitment data indicates 2007-2020 is a low recruitment period. However, average recruitment instead of low recruitment is currently being used for rebuilding projections. Therefore, this section considers using a low recruitment assumption as part of the rebuilding plan.

**Recommendation and Justification:**

- We support Option B: Use a low recruitment assumption for the 2022 stock assessment.
- Long term stock projections are uncertain but using a low recruitment assumption for the 2022 assessment will assist rebuilding because F is expected to be lower under a low recruitment assumption.

Section 4.4.2 Rebuilding Plan Framework (pg. 68) – This section simply considers whether to enable ASMFC to respond quickly to results of the 2022 stock assessment, expected in October 2022. Under status quo, an addendum process would be used to consider changes to management measures if the results of the 2022 assessment warrant management response. However, with an addendum, management change wouldn't occur until the 2024 fishing season. Option B enables the Board to act immediately for the 2023 fishing year if the results of the 2022 assessment warrant management response for rebuilding.

**Recommendation and Justification:**

- We support Option B: Enable ASMFC to respond quickly through Board action if the 2022 stock assessment indicates at least a 5% reduction in removals is needed to achieve F rebuild.

Section 4.6.2 Management Program Equivalency (pg. 74) – also called conservation equivalency (CE), it allows states flexibility to implement management measures that better fit the needs of their fishery while achieving the same quantified level of conservation. However, the current use of CE for striped

bass is not working, likely because of the dynamics between harvest and catch and release fishing combined with uncertainty in the MRIP data.

**Recommendation and Justification:**

- We support Sub-options B1-a and B1-c (pg. 76): Conservation equivalency would not be allowed when the stock is overfished and/or experiencing overfishing.
- We support Sub-option C3 (pg. 78): Conservation equivalency proposal would not be able to use MRIP estimates with PSE's exceeding 30 percent.
  - NMFS warns data with PSEs exceeding 30 percent "are not considered sufficiently reliable for most purposes and should be treated with caution"<sup>1</sup>.
- We support Sub-option D1 (pg. 78): 10% uncertainty buffer for conservation equivalency (CE) proposals.
  - We support the idea of an uncertainty buffer for striped bass CE proposals considering the unique dynamics of this fishery (e.g., 90% of fish caught are released).
  - However, rather than an arbitrary uncertainty buffer, we prefer an analysis that links a buffer percentage to precision issues of MRIP or poor performance of previous CE proposals.
- Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries (pg. 79).
  - We are supportive of constraints on CE, but this option oversimplifies how the fishery dynamics across the management unit impact the use of CE.
  - We recommend referring this to the subgroup of ASMFC's management and science committee working on revisions to the broader CE policy to further consider its implications and provide analysis of the performance of CE programs relative to coastwide measures to help better inform this discussion.

Thank you for the opportunity to comment.

Sincerely,

Michael Waive  
Atlantic Fisheries Policy Director  
American Sportfishing Association

Jeff Angers  
President  
Center for Sportfishing Policy

Ted Venker  
Conservation Director  
Coastal Conservation Association

Chris Horton  
Senior Director of Fisheries Policy  
Congressional Sportsmen's Foundation

John Gans  
Northeast Field Representative  
Theodore Roosevelt Conservation Partnership

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<sup>1</sup> <https://www.fisheries.noaa.gov/recreational-fishing-data/recreational-fishing-survey-and-data-standards>



April 15, 2022

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

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board (Board):

Thank you for the opportunity to comment on Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass. On behalf of conservation-minded fishing guides, charter boat captains, small fishing-related businesses, and anglers who rely on a robust striped bass population for income and recreation, we urge the Board to take decisive action to rebuild the fishery and establish management reforms that position the Atlantic striped bass stock for long-term abundance and stability. The need for such action is especially critical given that spawning stock biomass is at a 25-year low,<sup>1</sup> coupled with the fact that the three most recent young-of-year indices in upper Chesapeake Bay are among the lowest on record.<sup>2</sup> While the draft amendment includes much-needed changes to improve the outlook for striped bass, it also includes potential pitfalls, particularly on the topic of management triggers, that raise concern. In the paragraphs below, we outline our positions on each of the decision points for the four major issues contained in the draft amendment.

#### **4.1 Management Triggers**

With one notable exception, we are supportive of maintaining the status quo for the spawning stock biomass and fishing mortality triggers contained in the striped bass management plan. However, there are key opportunities to improve both the mechanics of the recruitment trigger and the specifics of needed Board action should the recruitment trigger be tripped.

##### **Tier 1: Fishing Mortality (F) Triggers**

Option A: Timeline to Reduce F to the Target

*Preferred Alternative—**Sub-option A1** (status quo): Reduce F to a level that is at or below the target within one year.*

Rationale: The Board should continue to need to take rapid action to curb overfishing. This need is magnified when taking into account the built-in lag in the Board's response time to end overfishing

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<sup>1</sup> ASMFC. 2019. Summary of the 2019 Benchmark Stock Assessment for Atlantic Striped Bass. [http://www.asmfc.org/uploads/file/5d28f18dAtlanticStripedBassAssessmentSummaryReport\\_April2019.pdf](http://www.asmfc.org/uploads/file/5d28f18dAtlanticStripedBassAssessmentSummaryReport_April2019.pdf).

<sup>2</sup> Maryland Department of Natural Resources. October 15, 2021. Chesapeake Bay 2021 Young-of-Year Survey Results Announced. <https://news.maryland.gov/dnr/2021/10/15/chesapeake-bay-2021-young-of-year-survey-results-announced/>.

once the trigger is tripped; for example, despite the Board’s learning in April 2019 that the stock was experiencing overfishing, the Addendum VI process precluded the ability to reduce fishing mortality until its measures were enacted for the 2020 fishing season.<sup>3</sup> Any further delay in action would only increase the risk to the stock.

#### Option B: F Threshold Triggers

*Preferred Alternative—**Sub-option B1** (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.*

Rationale: While we recognize that there is some uncertainty around only one year of recreational data collected through the Marine Recreational Information Program (MRIP), we prefer to take a precautionary approach to the resource should there be indicators that overfishing is occurring. Furthermore, if a two-year timeline were adopted (Sub-option B2), and the first year occurred in the terminal year of a stock assessment, the actual timeline for action could be further extended, even as overfishing may continue to occur.

#### Option C: F Target Triggers

*Preferred Alternative—**Sub-option C1** (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.*

Rationale: This option better aligns with the status quo options selected for Options A and B and denotes a relationship between F and SSB.

## Tier 2: Spawning Stock Biomass (SSB) Triggers

#### Option A: Deadline to Implement a Rebuilding Plan

*Preferred Alternative—**Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan.** The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment.*

Rationale: The implementation of a two-year deadline to implement a rebuilding plan is the one change to the F and SSB triggers that we support. While the Board took action to curb overfishing through Addendum VI, it has yet to explicitly confront the challenge of rebuilding the stock despite the fishery management plan’s requirement to do so within 10 years (i.e., by 2029). It has now been three years since the Board learned that the stock was overfished. A two-year deadline would compel the Board to act swiftly to rebuild the stock while also aligning with the rebuilding requirements for federally managed fisheries under the purview of the Magnuson-Stevens Act.

#### Option B: SSB Threshold Trigger

*Preferred Alternative—**Sub-option B1** (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].*

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<sup>3</sup> ASMFC. 2019. Addendum VI to Amendment 6 to the Atlantic Striped Bass Interstate Fishery Management Plan. [http://www.asmfc.org/uploads/file/5dd447baStripedBassAddendumVI\\_Amend6\\_Oct2019.pdf](http://www.asmfc.org/uploads/file/5dd447baStripedBassAddendumVI_Amend6_Oct2019.pdf).

Rationale: We see no need to remove the SSB threshold trigger at this time. The health of the striped bass stock is measured by SSB, and managers must take action if it declines to unhealthy levels.

#### Option C: SSB Target Trigger

*Preferred Alternative—Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].*

Rationale: Controlling F is always important, but especially so if it is associated with a decline in SSB.

### Tier 3: Recruitment Triggers

#### Option A: Recruitment Trigger Definition

*Preferred Alternative—Sub-Option A2: The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA) shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years. The high recruitment reference period used for this trigger may be adjusted as recommended by the TC during benchmark stock assessments. This trigger alternative has a moderate sensitivity; it is more sensitive than the status quo but less sensitive than sub-option A3.*

Rationale: Both Sub-option A2 and Sub-option A3 provide much-needed increases in sensitivity of the recruitment trigger in order to detect not just outright failure, but also periods of mediocre recruitment that necessitate a reduction in F. Modifying the juvenile abundance indices considered to include only those used in the stock assessment model to estimate recruitment is also a sensible adjustment. Sub-option A2 represents an intermediate sensitivity alternative that will inform the Board when recruitment is lackluster and in need of being considered. But it is not so sensitive as to be overly burdensome to managers while disregarding the inherent interannual variability in striped bass recruitment. Furthermore, we are concerned that if the recruitment trigger tripped too often, it could be more easily dismissed by both members of the Board and stakeholders.

#### Option B: Management Response to Recruitment Trigger

*Preferred Alternative—Sub-option B2: If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.*

Rationale: Both Sub-option B2 and Sub-option B3 address the urgent need to provide additional, specific guidance for Board action should the recruitment trigger be tripped. Adjusting the F target—and then adjusting F, if necessary—is an appropriate approach to account for fewer young striped bass entering the fishery.

### Tier 4: Deferred Management Action

*Preferred Alternative—Option A (status quo): No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the*

*Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.*

Rationale: In order to maximize the chances of achieving a robust striped bass stock, the Board must continue to respond to management triggers as they are tripped.

#### **4.2.2 Measures to Address Recreational Release Mortality**

Recreational release mortality has long been a part of the striped bass fishery, which is to be expected in a fishery that is primarily recreational and primarily catch-and-release. As the draft amendment mentions, roughly 90% of striped bass caught recreationally since 1990 have been released, even as regulations and abundance have fluctuated, underscoring the value that many anglers place on the catch-and-release experience.

We recognize that by the best estimate recreational release mortality accounts for approximately half of striped bass fishing mortality, and we understand the need to share burdens equitably among users of the striped bass resource when it comes to recovering and conserving the stock. However, in enacting management measures to reduce recreational release mortality, we insist that any such actions must be a) quantifiable, b) enforceable, and c) science-based. At the same time, we continue to promote the need to better educate anglers on actions they can take to improve the survivability of released fish.

#### **Option B. Effort Controls (Seasonal Closures)**

We do not support the inclusion of seasonal closures in Amendment 7, not because we unconditionally oppose the concept of limiting effort to reduce recreational release mortality, but because the options put forth at this time do not meet the criteria included above.

We oppose the concept of state-specific two-week closures (Sub-option B1) because of the disproportionate share of the burden (reduced fishing opportunities and economic losses) that would shift to more northern states with shorter fishing seasons, even as those states' waters typically have conditions more conducive to striped bass post-release survival (e.g., lower temperature, higher salinity, higher dissolved oxygen).

We are also opposed to the implementation of no-targeting closures at this time—either at the two-week state-specific level (Sub-option B1) or for spawning areas (B2-b)—both because the conservation impact of such closures could not be quantified and because of enforceability concerns. As the draft amendment states, estimating the benefit of no-targeting closures depends on assumptions about how angler behavior might change, which is highly uncertain, and the Striped Bass Technical Committee has yet to establish a method for estimating the reduction in mortality resulting from no-targeting closures. Until such a methodology is implemented, no-targeting closures would largely be punitive to the catch-and-release striped bass angling community with no tangible benefit for the resource. Furthermore, no-targeting closures present an intractable enforcement challenge<sup>4</sup> given that the burden is on law enforcement officers to prove intent of target species (e.g., similar methods used to target striped bass are also used for bluefish in marine environments and

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<sup>4</sup> ASMFC. January 26, 2022. Atlantic Striped Bass Draft Amendment 7 for Board Review. Presentation to the Atlantic Striped Bass Management Board.  
[http://www.asmfc.org/files/Meetings/2022WinterMeeting/AtlanticStripedBassBoardPresentations\\_Jan22.pdf](http://www.asmfc.org/files/Meetings/2022WinterMeeting/AtlanticStripedBassBoardPresentations_Jan22.pdf).

catfish in estuarine environments). Lastly, several producer areas have robust commercial seasons (gillnet and haul seine fisheries) during the early part of the spawning run. If the intent of these proposed measures is to ensure safe passage during the spawn, it is both counterintuitive and inequitable that these would be recreational-only measures.

We do understand the potential benefit that could arise from sub-option B2-a, no-harvest spawning closures, and would support further development of this alternative outside of the current Amendment 7 process. While we recognize that many states and jurisdictions have already implemented such closures, the draft amendment contains no maps indicating what new spawning area closures would look like. Without that information, it is difficult for the public to provide meaningful input. For example, should these closures only apply to areas where striped bass are actively spawning, despite evidence of reduced feeding activity during spawning?<sup>5</sup> Or should they include pre-spawn staging areas that are frequently subjected to intense recreational fishing pressure (e.g., Raritan Bay)? We recognize the rationale for no-harvest spawning closures but believe that these questions should be explicitly addressed through an addendum following the 2022 stock assessment update prior to implementation.

In the interim, we also encourage the Board to identify opportunities for increased research on post-release mortality of/sublethal impacts on large pre-spawning and spawning striped bass. Understanding the biological impacts of catch-and-release fishing on these valuable fish is critical for informing management and outreach measures to minimize risk to the spawning stock when it is at its most vulnerable.

### **Option C. Additional Gear Restrictions**

*Preferred Alternative—Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.*

Rationale: Prohibiting the use of lethal devices such as gaffs to land and release striped bass is a valuable, common-sense step to reduce release mortality that has already been adopted by some conservation-minded states. Numerous non-lethal alternatives (e.g., rubber-mesh nets and swiveling lip-grippers) that enable both efficient landing and safe release are widely available on the market.

*Preferred Alternative—Sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.*

Rationale: This language fulfills the intent of the circle hook provision included in Addendum VI and closes a potential loophole around the mandate to use an in-line circle hook with natural bait when recreationally fishing for striped bass.

### **Option D. Outreach and Education**

*Preferred Alternative—Sub-option D2: It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns.*

Regulations can only do so much when it comes to minimizing post-release mortality—much of the onus lies on the individual angler’s gear use, hooking/fighting methods, and handling/release

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<sup>5</sup> Delaware Division of Fish and Wildlife. May 2006. Striped Bass Food Habits Project. <https://pdf4pro.com/cdn/delaware-department-of-natural-resources-and-3c3ff.pdf>.

practices. As a result, we continue to support outreach efforts by individual states to promote best practices. At the same time, given limited state resources and the potential ability to leverage existing materials (e.g., from other states), we don't support the overly prescriptive nature of Sub-option D1.

We would also like to take the opportunity to express our opposition to the last recommended best practice included under Sub-option D1: "Once an angler has retained their bag limit, consider targeting a different species." This recommendation appears to disregard the numerous anglers who view catching and releasing striped bass as the goal in their angling experience and implies that the only value in the fishery comes from harvest. As a result, we recommend removing this suggestion from the list of best practices.

#### **4.4 Rebuilding Plan**

We are encouraged to see the Board addressing the need to implement a rebuilding plan for the overfished striped bass stock. Rapid action that accounts for recent poor recruitment is imperative for rebuilding the stock to the target by 2029.

##### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

*Preferred Alternative—Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.*

Rationale: It is imperative to adjust fishing mortality to account for the recent decline in spawning success of striped bass. We recognize that this approach could result in stricter measures in the short term but believe that it better positions the Board to meet the Fishery Management Plan's goals in the long term.

##### **4.4.2 Rebuilding Plan Framework**

*Preferred Alternative—Option B: 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 recruitment assumption specified in Amendment 7) 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.*

Rationale: If the 2022 stock assessment indicates that the fishery is not on track to rebuild by 2029, as required, the Board must take quick and decisive action to further reduce fishing mortality. The standard addendum process would delay management action for a year, further jeopardizing the ability to promptly rebuild. Option B would enable the Board to quickly enact new measures for the 2023 fishing season—should it be necessary. While we recognize that this option would not afford the full public comment process that an addendum entails, we also understand that there will be opportunities for the public to provide input to the Board before it makes its decision on specific measures to take.

##### **4.6.2 Management Program Equivalency**

We are not unconditionally opposed to Management Program Equivalency—also known as conservation equivalency (CE)—which we recognize may be warranted for some states/jurisdictions to account for the unique nature of their fisheries. However, we are also well-aware of the additional uncertainty that CE can inject into management, and have witnessed how CE can be abused by



individual states in a way that jeopardizes the effectiveness of coastwide conservation efforts. For example, New Jersey’s CE provisions under Addendum VI enabled its anglers to harvest striped bass less than 28 inches and greater than 35 inches, undermining the goal of protecting fish outside of the coastwide 28-35 inch slot limit.<sup>6</sup> Given these concerns, we are hopeful that some of the proposed guardrails around CE that are included in this section will ultimately be incorporated into Amendment 7.

### **Option B. Restrict the Use of Conservation Equivalency Based on Stock Status**

*Preferred Alternative—Sub-option B1-a: CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.*

Rationale: Given the additional risk associated with CE implementation, it should not be an option when the stock is overfished.

### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

*Preferred Alternative—Sub-option C3: CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30.*

Rationale: As stated in the draft amendment, under NOAA Fisheries’ new Recreational Fishing Survey and Data Standards, MRIP estimates with a PSE exceeding 30 will include a warning that they “are not considered sufficiently reliable for most purposes, and should be treated with caution.”<sup>7</sup> In line with that guidance, we do not believe that estimates associated with a PSE of greater than 30 should be used in CE proposals. This sub-option does not preclude the ability of states to increase their own recreational fishery sampling efforts in order to increase the precision of estimates and thus enable the use of CE.

### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

*Preferred Alternative—Sub-option D2: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.*

Rationale: The addition of a front-end uncertainty buffer is a valuable step toward accounting for the additional uncertainty in achieving management objectives resulting from CE. A 25% buffer is an appropriate middle ground that does not rule out the use of CE but does account for its additional risk to the fishery.

### **Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

*Preferred Alternative—Sub-option E2: Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state-specific level.*

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<sup>6</sup> ASMFC. 2020. Next Steps for Management. Memorandum from Max Appelman to the Atlantic Striped Bass Management Board. [http://www.asmfc.org/uploads/file/5ec2b1b5AtlStripedBassTC\\_Report\\_April2020.pdf](http://www.asmfc.org/uploads/file/5ec2b1b5AtlStripedBassTC_Report_April2020.pdf).

<sup>7</sup> NOAA Fisheries. Recreational Fishing Survey and Data Standards. <https://www.fisheries.noaa.gov/recreational-fishing-data/recreational-fishing-survey-and-data-standards>.

Rationale: It is fair and equitable for individual states to bear the proportionate burden when a reduction in fishing mortality is needed (or, in the case of liberalization, to enjoy the proportionate increase). Requiring states to achieve their respective change in fishing mortality will further ensure the likelihood of the Board's achieving the coastwide target.

Striped bass are at the core of the east coast's recreational fishing community and economy, and all eyes are on the Striped Bass Board as it decides the fate of the ASMFC's flagship species. Please take this opportunity to position this treasured species for recovery and long-term success.

We thank you for your consideration of our comments.

Sincerely,



Tony Friedrich  
Vice President and Policy Director  
American Saltwater Guides Association  
[tony@saltwaterguidesassociation.org](mailto:tony@saltwaterguidesassociation.org)



Willy Goldsmith, Ph.D.  
Executive Director  
American Saltwater Guides Association  
[willy@saltwaterguidesassociation.org](mailto:willy@saltwaterguidesassociation.org)

*(Supporting organizations and businesses are listed on the following pages)*

Supporting Organizations



American Fly Fishing Trade Association



Maine Association of Charterboat Captains



Marine Fish Conservation Network



Rhode Island Saltwater Anglers Association



Backcountry Hunters & Anglers



Connecticut Surfcasters Association



High Hill Striper Club

Supporting Businesses



Hogy Lures



Bear's Den Fly Shop



Salty Cape



Thomas & Thomas



*Supporting Businesses (continued)*



Temple Fork Outfitters



Old Maine Outfitters



Umpqua Feather Merchants



RepYourWater



Scientific Anglers



R.L. Winston Rod Company



Guiding Flow



Angling Trade Media



Rio Products



Game On Fishing Lures



Eastern Rodworks



Crafty One Customs



Sylvestre Outdoors



HMH Vices



Shilton Reels



Flymen Fishing Company



District Angling



TCO Fly Shop



Abel Fly Fishing Reels



Ross Reels



Supporting Businesses (continued)



Tide Chasers Podcast



Seigler Reels



Cortland Fishing Line



Manhattan to Montauk Fishing



Badfish Supply



Maine Fly Fish



Coop's Bait and Tackle



Norvise Fly Tying



Anglers Journal



Hooked Fishing Apparel



IslandX Lures



The Tightlined Slam



Fly Fishing Jobs



Coastal Fly Angler



Lamson Waterworks



OutCast Lures



Regal Vise

Supporting Businesses (continued)



Bay Fly Fishing



Florida Fishing Products



Rita B. Offshore Fishing



Howard Films



Brynnie B Inshore Fishing



River Bay Outfitters



Ben Whalley Fishing



**SOUL FLY**  
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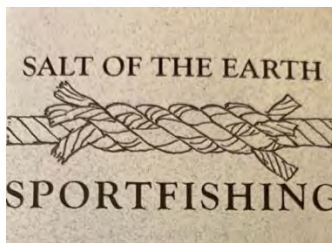
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Barnegat Bay Adventures

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Charters**



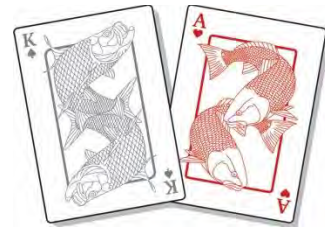
Light Bite Charters



Waterdog Guide Service

*Long Island*  
**Fly FISHING**

Long Island Fly Fishing



**HIGH ROLLER**  
GUIDE SERVICE

High Roller Guide Service



DOG DAYS FISHING

Dog Days Fishing

**Barefoot**

ADVENTURES

Barefoot Adventures

**Boylermaker Charters**

From: [kevin@annapolisanglersclub.com](mailto:kevin@annapolisanglersclub.com)  
Sent: Friday, April 15, 2022 5:36 PM  
To: [Comments](#)  
Cc: [Emilie Franke](#)  
Subject: [External] Comments on Draft Amendment 7  
Management Plan for Atlantic Stripped Bass

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Categories: Auto Replied

Hello ASMFC and all Members of the Atlantic Striped Bass Management Board.

As President of the Annapolis Anglers Club, I represent over 650 Recreational Anglers who are alarmed and disappointed with the current Atlantic Striped Bass Fishery. I am often asked "How did we get here" meaning what Did or Didn't happen to bring us the current status of the SB Fishery. I am also often asked "How long will it take to recover to the abundance seen 10 years ago?" The answer of "The current plan is 10 years" is widely viewed as unacceptable.

I have distilled the many opinions I have heard in the past three years to one High Level Theme. Recreational Anglers are asking for Atlantic Striped Bass to be managed for Sustained Abundance and not for Maximum Yield.

Now onto the specific Options of the Draft Amendment 7. Here are the selections that I endorse.

#### Management Triggers

Tier 1: Fishing Mortality (F) Triggers

Option A: Timeline to Reduce F to target. Selection: A1 within 1 year

Option B: F Threshold Trigger Selection: B1 F exceeds threshold

Option C: F Target Trigger Selection: C1 F exceeds target for 2 consecutive years

Tier 2: Female Spawning Stock Biomass (SSB) Triggers

Option A: Deadline to Implement a Rebuilding Plan Selection: A2 Two Year deadline to implement

Option B: SSB Threshold Trigger Selection: B1 SSB falls below the threshold

Option C: Target Trigger Selection: C3 No trigger related to SSB target

Tier 3: Recruitment Trigger

Option A: Recruitment Trigger Definition Selection: A2 Moderate Sensitivity

Option B: Management Response to Recruitment Trigger Selection: B2 Most Conservative Response

Tier 4: Deferred Management Action Selection: Option A No Deferred Action and Option F

#### Recreational Release Mortality

Option A: Circle Hook Requirement Only Selection: Option A



Option B: Effort Controls (Seasonal Closures)      Selection: B1:  
State Specific 2 week closures  
Option B2: Spawning Area Closures      Selection: B2-a: No harvest  
during Waves 1 & 2  
Option C: Gear Restrictions      Selection C1: Prohibit any  
lethal device  
Option D: Outreach and Education      Selection D1: Outreach is  
Required

#### Rebuilding Plan

Recruitment Assumption for 2022 Assessment      Selection: Option B  
Low Recruitment Assumption  
Process of Responding to the 2022 Assessment      Selection: Option B  
Board Action

#### Conservation Equivalency

Option A: Board Discretion      Selection: Board Discretion  
Option B1: Restricted Use of CE based on Status      Selection: B1-a  
and B1-c  
Option B2: Applicability      Selection: B2-a Hudson River  
and Delaware River & Bay  
Option C: Precision Standards for MRIP Est.      Selection: C3 30 PSE  
Option D: CE Uncertainty Buffer      Selection: D1 10 percent  
Option E: Definition of Equivalency      Selection: E1 Apply the  
FMP standard @ coastwide level

Thanks in advance for the opportunity to share these comments and  
for taking on the task of creating the next Framework for actions  
necessary to Rebuild the Atlantic SB Fishery. I hope that you will  
look in the future with how you contributed to this popular fishery.

Kevin McMenamin  
President - Annapolis Anglers Club  
745 Rolling View Drive Annapolis MD 21409  
[kevin@annapolisanglersclub.com](mailto:kevin@annapolisanglersclub.com)  
(410) 340-5030 Mobile



# BACKCOUNTRY HUNTERS AND ANGLERS

NEW ENGLAND CHAPTER  
NEW JERSEY CHAPTER  
CAPITAL CHAPTER

NEW YORK CHAPTER  
NORTH CAROLINA CHAPTER  
PENNSYLVANIA CHAPTER

April 14, 2022

Via Email: [comments@asmfc.org](mailto:comments@asmfc.org)

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

**Re:** Comments on Draft Amendment 7 to the Atlantic Striped Bass Fishery Management Plan

Dear ASMFC Staff and Members of the Management Board:

In this correspondence we are writing on behalf of the Leadership Boards of the New England, New York, New Jersey, North Carolina, Capital and Pennsylvania Chapters of Backcountry Hunters & Anglers (collectively, "BHA") to provide our comments and concerns regarding Draft Amendment 7 to the Atlantic Striped Bass Fishery Management Plan ("Amendment 7").

Across North America, the numerous chapters of Backcountry Hunters & Anglers are focused on advancing proven approaches to protecting North America's wild places and rich outdoor heritage of hunting and fishing in a natural setting. As the organization's footprint has expanded, we strive to apply our mission across the continent to conserve North American wildlife.

Along the Atlantic Coast, from Maine to North Carolina, fishing for Atlantic Striped Bass is as much a part of our outdoor heritage as any pursuit in our region. Currently, we are concerned with the state of the Atlantic Striped Bass fishery in the Northeast. Since the enactment of Amendment 6 in 2003 overfishing has led to an overfished stock and diminished abundance. Additionally, juvenile abundance surveys indicate recruitment has been well below average in recent years, leaving few strong year classes of fish to assist with the stock's recovery. The future of our Striped Bass fishing traditions relies on an abundant, accessible population of fish in the water. Therefore, **the principles that will guide our priorities for inclusion in Amendment 7 are to recover the Striped Bass female spawning stock biomass to target levels as soon as reasonably possible, and to implement policies that ensure target levels are maintained long-term after recovery.** Accordingly, our comments on the specific issues and priorities for inclusion in Amendment 7 are as follows below herein.

## **4.1 – Management Triggers**

### **Tier 1 Options – Fishing Mortality (F) Triggers**

#### **Priorities for Inclusion:**

- **Sub-Option A1**
- **Sub-Option B1**
- **Sub-Option C1**

Because fishing mortality (F) is a direct result of angler effort and behavior, and subsequently can be controlled by management action more readily than any other trigger, rapid response should be a top priority for F triggers. Given that the intention of managing the fishery to target and threshold levels is to provide some buffer for fluctuations, both  $F_{\text{Target}}$  and  $F_{\text{Threshold}}$  triggers should be included in Amendment 7 and thus, BHA requests that the primary objective of the Atlantic Striped Bass Management Board (the “Board”) is to maintain F below  $F_{\text{Target}}$ . The buffer between  $F_{\text{Target}}$  and  $F_{\text{Threshold}}$  allows a degree of management consistency with both options C1 (preferred) and C2 providing multi-year scenarios before action must be taken if F exceeds  $F_{\text{Target}}$ . Further, if F exceeds  $F_{\text{Threshold}}$  and overfishing is occurring, then the need to quickly correct this scenario outweighs the convenience of management consistency and therefore, BHA supports sub-options A1 and B1.

### **Tier 2 Options – Female Spawning Stock Biomass (SSB) Management Triggers**

#### **Priorities for Inclusion:**

- **Sub-Option A2**
- **Sub-Option B1**
- **Sub-Option C2**

Female Spawning Stock Biomass (SSB) is the gauge by which the fishery’s abundance is measured, and as a result a decrease in abundance must be addressed appropriately by the Board. Given the intention of managing to target and threshold levels, both C2 (preferred) and C1 provide multi-year options if SSB falls below  $SSB_{\text{Target}}$  to allow for a degree of management consistency. In this situation we favor sub-option C2 because it does not rely on excessive fishing mortality, which is one of many causes that could lead to a decline in SSB requiring correction. If SSB falls below  $SSB_{\text{Threshold}}$  and the stock is declared overfished stronger action is needed, which would be accomplished through sub-option B1. While Amendment 6 required a 10-year timeline for rebuilding if SSB falls below  $SSB_{\text{Threshold}}$  it did not require the Board implement a rebuilding plan within a specified timeline. BHA feels that when any SSB trigger is tripped, implementing a rebuilding plan in a timely manner should be required. The 2-year timeline proposed in sub-option A2 would ensure the best possible chances to rebuild the stock within the 10-year requirement.

### **Tier 3 Options – Recruitment Triggers**

#### **Priorities for Inclusion:**

- **Sub-Option A2**
- **Sub-Option B2**

While the options related to fishing mortality and female SSB do not represent considerable changes from the management triggers in Amendment 6, the options related to recruitment provide an opportunity to significantly improve protection of the fishery.

Juvenile recruitment relies on factors other than female SSB and fishing mortality and thus, even a well-managed fishery can suffer from low recruitment during periods when several years of sub-optimal conditions occur in a row. Consequently, the need for a more sensitive recruitment trigger was highlighted during the Board’s Fall meeting in which options to protect the remaining strong juvenile recruitment classes were removed. Generally, the fishery would have likely benefitted from a more sensitive recruitment triggers to protect those year classes until a new strong year class occurred. Both sub-options A2 (preferred) and A3 are more sensitive than the status-quo.<sup>1</sup>

The point of implementing a stronger juvenile recruitment trigger is to protect the remaining fish in the water if recruitment suffers for a prolonged period so they can assist in recovering the stock. Thus, BHA supports sub-option B2, which requires the Board to reduce F to a low-recruitment assumption within one year and determine appropriate action at the next stock assessment if the recruitment trigger is tripped.

### **Tier 4 Options – Deferred Management Action**

#### **Priorities for Inclusion:**

- **Option A**

BHA does not support any of the deferred management options presented that would allow response to triggers to be ignored or delayed.

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<sup>1</sup> BHA acknowledges concerns that A3 may result in overly burdensome management requirements if a more binding response option is selected, however, the status quo falls short of being a beneficial recruitment trigger.

## **4.2.2 Measures to Address Recreational Release Mortality**

### **Priorities for Inclusion:**

- **Sub-Option C1**
- **Sub-Option C2**
- **Sub-Option D2**

We prioritize recovering the stock as quickly as reasonably possible as a guiding principle. While the intent of Option B and its sub-options appears to decrease fishing mortality by reducing recreational effort, we oppose the proposed measures for inclusion in Amendment 7. BHA's members are primarily recreational anglers who occupy all segments of the fishery, including without limitation shore-based wading, personal watercraft, and utilizing for-hire charter fishing services, and therefore measures taken to reduce effort would directly affect our opportunities to pursue fish. A primary concern with Option B relates to the note on Page 60 of the draft document, which states that the success of no-targeting closures is highly uncertain. Further, the Technical Committee has not established a method for estimating reduction in removals. Therefore, without an understanding of the anticipated benefit or the likelihood that a benefit to the fishery would even occur, the Board cannot proceed with an informed assessment on the merits of the proposed measures. BHA also shares the concerns of the Law Enforcement Committee, that any restrictions on targeting striped bass will, as a practical matter, be unenforceable. Finally, measures implemented as part of the Amendment would persist beyond recovery of the stock if included in Amendment 7, which may result in unnecessary burden on recreational anglers.

While BHA supports efforts to share information regarding best handling and release practices, as well as general education on the state of Striped Bass, we also recognize that state agencies operate with limited resources and personnel. As a result, we prefer sub-option D2, which recommends states engage in educational efforts while balancing resources appropriately across the range of responsibilities rather than requiring public education related to Striped Bass.

## **4.4 Rebuilding Plan**

### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

#### **Priorities for Inclusion:**

- **Option B**

A formal rebuilding plan to recover the stock by 2029 remains nonexistent. Further, we continue to be concerned about the declining trend of the stocks. BHA emphasizes that the Board take measures to protect the fish that remain in the water by including option B.

#### 4.4.2 Rebuilding Plan Framework

##### Priorities for Inclusion:

- **Option B**

We are concerned that the 2022 stock assessment could indicate measures included in Amendment 7 are unlikely to achieve recovery by 2029. Thus, the benefit of option B is that such action could be taken almost immediately, rather than requiring a year-long addendum process. Recognizing that this option would be a one-time allowance and is contingent on a very dire outlook for the future of the fishery, BHA supports Option B, which would allow the Board to implement needed recovery measures as quickly as possible.<sup>2</sup>

#### 4.6.2 Management Program Equivalency

##### Priorities for Inclusion:

- **Sub-option B1-a**
- **Sub-option C3**
- **Sub-option D2**
- **Sub-option E2**

To paraphrase ASMFC's Guidelines, the concept of Conservation Equivalency (CE) is intended to allow states flexibility to develop alternative regulations that better accommodate local conditions while still achieving the overall conservation goals of the Fishery Management Plan. However, introducing alternative regulations makes it more difficult to determine the effectiveness of the coastwide management plan or such alternative measures. As a result, we support sub-options B1-a, which restrict the use of CE during times when the stock is declared overfished<sup>3</sup>. In conjunction with a female SSB trigger related to  $SSB_{Threshold}$ , this option would ensure the management focus is on rebuilding the stock for the benefit of the entire Atlantic Coast if the  $SSB_{Threshold}$  trigger is tripped, as opposed to accommodating situations in specific states during times when recovery should be the priority.

As outlined by the National Marine Fisheries Service, "PSEs of 30 percent or greater are not considered sufficiently reliable for most purposes and should be treated with caution". CE proposals should rely on data that is sufficiently accurate to make informed management decisions and thus, BHA supports sub-option C3.

Unlike quota-managed fisheries, the Board has not utilized its discretion over CE programs to ensure that non-quota fisheries are held accountable for exceeding their respective intended

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<sup>2</sup> Allowing an unsuccessful management regime to continue for an additional year will further weaken the striped bass population.

<sup>3</sup> BHA recognizes that sub-option B1-b would also accomplish the stated goal, although we also acknowledge that this option would likely result in Conservation Equivalency being restricted during times when the stock is not being recovered.

impact. We understand that sub-options outlined in option D seek to decrease the chances that CE proposals exceed their intended impact by proactively imposing an uncertainty buffer and support sub-option D2. If sub-option B1-a or similar is not selected and CE continues to be allowed during rebuilding, then requiring a higher uncertainty buffer sub-option would be appropriate, in which case BHA supports sub-option D3.

We recognize that a multitude of factors, e.g., total angler effort and accessibility of fish in the area, result in each state having a different total impact on the fishery. Some states will have a greater impact than others and thus, BHA supports sub-option E2.<sup>4</sup>

In conclusion, the Leadership Boards of the New England, New York, New Jersey, North Carolina, Capital and Pennsylvania Chapters of Backcountry Hunters and Anglers urge the Striped Bass Management Board **to prioritize options that will recover the Striped Bass stock to target levels as soon as reasonably possible, and to implement policies that ensure target levels are maintained long-term after recovery.** These are the necessary steps to preserve our traditions of fishing for Striped Bass for current and future generations.

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:

New England Chapter Board  
(Connecticut, Maine, Massachusetts,  
New Hampshire, Rhode Island, Vermont)  
[newengland@backcountryhunters.org](mailto:newengland@backcountryhunters.org)

New York Chapter Board  
[newyork@backcountryhunters.org](mailto:newyork@backcountryhunters.org)

New Jersey Chapter Board  
[newjersey@backcountryhunters.org](mailto:newjersey@backcountryhunters.org)

North Carolina Chapter Board  
[northcarolina@backcountryhunters.org](mailto:northcarolina@backcountryhunters.org)

Capital Chapter Board  
(Maryland, Virginia)  
[capital@backcountryhunters.org](mailto:capital@backcountryhunters.org)

Pennsylvania Chapter Board  
[pennsylvania@backcountryhunters.org](mailto:pennsylvania@backcountryhunters.org)

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<sup>4</sup> Sub-option E2 would weigh necessary reductions and liberalizations based on the projected impact in the state utilizing CE, rather than imposing the coastwide requirement. A coastwide requirement could be disproportionate based upon on the size and impact of the state’s anglers on the coastwide fishery.



## **Berkley Striper Club**

PO Box 9  
Seaside Park, NJ, 08752

6 April 2022

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

Dear Ms. Franke,

Thank you for considering this public comment offered on behalf of the more than 100 members of the Berkley Striper Club.

Established in 1966, the Berkeley Striper Club is one of the largest and most active surf-fishing clubs in New Jersey. While our home waters are primarily around Seaside Park, New Jersey, our members fish for Striped Bass as far north as Maine and as far south as North Carolina and as far west as Santa Cruz, Ca. The Berkeley Striper Club's objective is to promote and protect recreational fishing interests, while safeguarding our natural resources.

Our club takes preservation of Striped Bass stocks seriously. The Berkley Striper Club was the first fishing club in New Jersey to exclusively utilize catch and release tournaments. Our members actively participate in Striped Bass research through Monmouth University and Rutgers University and our club's tagging program, established in 1986, has tagged over 39,000 Striped Bass. Over the past 10 years, our members have contributed \$65,000 to fisheries defense projects, including Gray Fish Tag, Monmouth University Stripers for the Future, Menhaden Defenders, Save Barnegat Bay, and Virginia Coastal Conservation Association habitat preservation programs. We care deeply about the health of the Atlantic Striped Bass and we invest our time and resources to protect them.

On April 6, 2022 our members met to discuss the Atlantic Striped Bass Draft Amendment 7. Our preferences regarding the public comment options come out of our orientation toward conservation, preference for abundant stocks, and a level of dissatisfaction with actions over the last decade that allowed healthy stock fall to its the present over-fished state.

When our public comments in 2013 and 2019 supported the more forceful measures to reduce striped bass mortality and increase female Striped Bass Spawning Stock biomass, we noted with disappointment that the Board adopted solutions that only had a 50% chance of success. Even now, three years after the 2018 stock assessment that confirmed that Striped Bass are over-fished and overfishing is occurring, the earliest expected action will not come until 2023 or possibly 2024. As a result, we do not have high-confidence in the judgement of the Board as stewards of this public resource and we are skeptical of the resolve board to independently act in a timely manner to fulfill its mandate and return the Atlantic Striped Bass stock to health.

In this context, our preference is for options that compel the Board to act quickly and forcefully. We prefer enforceable measures that carry a high level of certainty (certainty substantially better than coin-flip) to restore the Atlantic Striped Bass to good health in the shortest period of time. We do not support options that allow the Board discretion for inaction when the science indicates that action is required.

Berkeley Striper Club Draft 7 Input 6 April 2022



The Berkley Striper Club supports the following Draft Amendment 7 options:

**4.1 Management Triggers:**

Tier 1-Fishing Mortality Management Triggers

- Option A1
- Option B1
- Option C1

Tier 2-Female SSB Management Triggers

- Option A2
- Option B1
- Option C1

Tier 3-Recruitment Triggers

- Option A2
- Option B2

Tier 4 Deferred Management Action

- Option A

**4.2.2 Recreational Release Mortality**

- Option B-2a
- Option C1
- Option C2
- Option D1

**4.4.1 Rebuilding Plan**

- Option B: Use low recruitment regime assumption

**4.4.2 Rebuilding Plan Framework**

- Option B

**4.6.2 Management Program Equivalency**

- Sub-Option B1a
- Sub-Option B2b
- Sub-Option B1c
- Sub-Option C3
- Sub-Option D3
- Sub-Option E2

Thank you again for your kind consideration.

Very Respectfully,

John Kravchak  
President, Berkley Striper Club

From: [CaptainRichWood@comcast.net](mailto:CaptainRichWood@comcast.net)  
Sent: Wednesday, April 13, 2022 10:11 PM  
To: [Comments](#)  
Subject: [External] Amendment 7 Public  
Opinion/Feedback

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Categories: Auto Replied

Ms. Emilie Franke  
Atlantic States Marine Fisheries Commission  
1050 N. Highland Street, Suite 200 A-N  
Arlington Virginia 22201  
RE: Draft Amendment 7 Comments

Dear Ms. Franke:

On behalf of the Cape Cod Charter Boat Association (CCCBA) whose membership includes the for hire fleet and commercial fisherman, please accept the following comments on draft Amendment 7 to the Atlantic Striped Bass Fishery Management Plan. Rather than explain our detailed rationale for each section which we are giving comment upon, for brevity sake we are only providing our recommendations. If you require further clarification please contact me directly.

#### 4.1 Management Triggers

Tier 1 Fishing Mortality Management Triggers:  
Sub-option A2, Sub-option B2, and Sub-Option C2. A multiyear fishing mortality is recommended, common sense says more data, i.e., multiple years, a larger sample size, will result in more accurate decisions.

Tier 2 Female Spawning Stock Biomass Management Triggers: Sub-option A1, status quo. Option B, Sub-option B1. The current biological reference points, including the SSB thresholds, in our opinion is too high. Option C, Sub-option C3. We disagree that variability around a biomass target should prompt an immediate management response.

Tier 4 Deferred Management Action: Option B - management action should be deferred until the next assessment, no rushing, get more data which equates to better decisions.

#### 4.2 Recreational Fishery Management Measures

Mortality associated with the releasing of striped bass by the recreational fishery is the MAJOR issue impacting striped bass stocks. However, the continued use of a 9% mortality rate, when there are so many questions and issues are related to using this number, leaves us shaking our head. Measures to reduce mortality which have been implemented, such as circle hooks, no treble hooks, etc etc, cannot even be quantified, and there are many other variables impacting mortality which also have not been quantified.

Of major concern is discussion of a potential two week seasonal or spawning area closure. On the one hand zero review has been done on the socioeconomic impact of said closures, and when coupled with the lack of scientific data specifying any true benefits of such closures it defies logic this option is even being considered.

Additionally, Option B1.- minimum 15% trip reductions and Option B1.- minimum 25% trip reductions will have major negative socioeconomic impacts while the potential benefits seem to be guesses or estimates not based in actual science.

Option C: Additional Gear restrictions in addition to circle hooks, Sub Option C1- Rec anglers must use nonlethal devices to land or release bass and Sub Option C2- Any bass caught by non approved take methods must be returned to the water immediately without additional injury seem like basic common sense, and we would probably support provided with more detailed outlines of these proposals.

In summary on this area, we just don't see any fact based analysis that reductions in fishing efforts will reduce fishing mortality. Based upon this, we support Option A.

#### 4.4 Rebuilding Plan

Based upon history, female striped bass SSB, and environmental factors which are uncontrollable by any of us, we believe a striped bass biomass rebuild date of 2029 is unrealistic. It seems to make sense to us to acquire more data prior to approving a new amendment, perhaps the next benchmark assessment in 2025.

#### 4.5 Management Program Equivalency

Option A allows the continued use of conservation equivalency, and allows the various states the ability to tailor their own actions to the specifics of their region and in the best interest of the stock and anglers. We urge keeping CE versus coastwise measures. Not to do so allows other states to continue to exceed quotas/targets without accountability.

Sincerely,

Richard Wood  
President, CCCBA  
[captainrichwood@comcast.net](mailto:captainrichwood@comcast.net)  
860-716-0202

Captain Rich Wood  
Beth Ann Charters  
860-716-0202

<https://bethanncharters.com/>

Beth Ann Charters would love your feedback. Post a review to our profile.

<https://g.page/r/CcAsbLMs2zN2EB0/review>



## ***CARVER SPORTSMEN'S CLUB***

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

April 11, 2022

Dear Emilie Franke,

### **RE: Public Comment on Draft Amendment 7 to the Atlantic Striped Bass FMP**

I submit this letter on behalf of the Carver Sportsmen's Club whose members are avid recreational fishing families, for hire operators and commercial harvesters

#### ***4.1 Management Triggers***

##### **Tier 1 Options: Fishing Mortality (F) Triggers**

CSC overwhelmingly supports continued use of the management strategy that manages striped bass with a Target reference point that is more conservative than the Threshold (overfishing) reference point.

A majority of CSC members support Sub-option A2. These members suggest when the Target reference point is triggered; implementing measures to achieve the Target within 2 years is reasonable.

A few of our members but not an insignificant number believe 2 years is too long in a striped bass fishery that is in significant decline. These members support Sub-option A1.

CSC supports Sub-option B1 (status quo)

CSC supports Sub-option C1 (status quo)

##### **Tier 2 Options: Female Spawning Stock Biomass (SSB) Management Triggers**

MSBA supports Option A2. We feel delay has been an issue in striped bass management and two years is reasonable time to implement any management action.

CSC supports Option B1 (status quo)

CSC supports Option C1 (status quo)

##### **Tier 3 Options: Recruitment Triggers**

CSC supports Sub-option A3

CSC supports Sub-option B2

#### **Tier 4 Options: Deferred Management Action**

The CSC membership overwhelmingly supports Option A (status quo): No Deferred Action. We feel ASMFC must stop the practice of creative delay of any kind when a trigger has been hit.

### **4.2 Recreational Fishery Management Measures**

#### **4.2.1 Size Limits, Bag Limit and Seasons**

CSC supports continued use of these management tools.

#### **4.2.2 Measures to Address Recreational Release Mortality**

CSC supports Option A and urges ASMFC to continue the Addendum VI circle hook measures.

CSC is opposed AT THIS TIME to Option B entirely as we feel options for both Seasonal Closures & Spawning Closures for striped bass are underdeveloped and require improvement before more serious discussion and consideration. We encourage ASMFC to prioritize development of ways that both seasonal & spawning closures might be implemented in the future.

CSC supports Option C. Additional Gear Restrictions

CSC supports Option C1 as is already the case in the Commonwealth of Massachusetts.

CSC is **opposed** to Option C2. The number of methods used to fish for striped bass are truly more than most fishery managers can comprehend. States, regions, towns, beaches, estuaries, rivers etc. all have local nuance that would make creating an accurate list of current methods in use nearly impossible. Even if such a list could be created; the vast amount of staff time required to conduct even a rudimentary analysis of which current methods would be approved or disapproved would be overwhelming and have significant social and economic consequences. To repeat; CSC is **opposed** to Option C2.

CSC is Opposed to inclusion of Option D in any way shape or form. Some of our members are offended by the way this so-called option is presented for consideration. Of course, Information & education programs are needed HOWEVER this option offers zero information beyond the words “Information” and “Education”. BEFORE considering a requirement that all states develop an information & education program that can be measured for compliance; common sense indicates a need to development some sort of a standard to be measured. Considering a 5 minute google search reveals all ASMFC members states have some sort of I&E program in place; this option is a waste of ASMFC staff time and resources.

### **4.3 Commercial Fishery Management Measures**

CSC has no comment on this section.

### **4.4 Rebuilding Plan**

#### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

CSC supports Option B. To deny striped bass are in a low recruitment situation is bizarre and we feel the methods of calculation described in option B are needed at this time.

#### **4.4.2 Rebuilding Plan Framework**

CSC members believe the striped bass stock is in worse shape than indicated in the analysis that justified launch of this Amendment. We anticipate the 2022 stock assessment will reveal continued decline in the stock and possibly recruitment failure. We support the idea that ASMFC needs to be ready to take swift action IF the assessment indicates recent actions have failed to prevent overfishing during significant decline in recruitment.

CSC members are not all in favor of preapproving actions without significant public input HOWEVER we feel the pending stock assessment may reveal an emergency and if that is the case, the decision to support Option B is easy. CSC trusts that ASMFC & members states will do their best to solicit public input if this potential action is required.

#### 4.6 Conservation Equivalency

##### 4.6.2 Management Program Equivalency

CSC members overwhelmingly believe Conservation Equivalency Programs should NOT be allowed for striped bass.

CSC realizes ASMFC is likely to allow CE programs which is why we provide the following input. To allow any state to propose a CE program we urge ASMFC to adopt strict regulations that FIRST Require any CE program include pre-determined metrics that will measure & judge both effectiveness & accountability and 2) Any CE program must be held to significantly more strict tolerances than those of the management plan.

CSC reluctantly prefers Option B.

CSC reluctantly prefers Sub-options B1-a, B1-b & B1-c

CSC reluctantly prefers Sub-options B2-a, B2-b & B2-c

CSC reluctantly prefers Sub-option C3

CSC reluctantly prefers Sub-option D3

CSC reluctantly prefers Sub-options E2

Carver Sportsmen's Club appreciates and thanks the ENTIRE ASMFC Staff along with all members of the ASMFC Atlantic Striped Bass Management Board for their ongoing stewardship of Atlantic Striped Bass.

On behalf of our entire membership, we thank you for your consideration of our opinions on these important issues.



Paul Johnson

President

Carver Sportsmen's Club

Carver, Massachusetts



CHESAPEAKE BAY FOUNDATION  
*Saving a National Treasure*

April 15, 2022

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

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J. Sedwick Sollers III

R. Todd Stravitz, MD

Sandra E. Taylor

Preston M. White

Robert N. Whitescarver

Stephen M. Wolf

RE: Comments on Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass

Submitted via email only to: [comments@asmfc.org](mailto:comments@asmfc.org)

Dear Ms. Franke:

On behalf of the Chesapeake Bay Foundation (CBF), we wish to provide the following comments on the Atlantic States Marine Fisheries Commission's (ASMFC) Draft Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic striped bass. CBF is the largest conservation organization dedicated solely to saving the 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.

Striped bass are the most iconic finfish species in the Chesapeake Bay region. Both Maryland and Virginia have designated the species as their state fish.<sup>1,2</sup> This highlights the economic and cultural importance of the species to both the commercial and recreational sectors. More importantly, spawning activity in the Chesapeake Bay accounts for over 70 percent of the coastal migratory striped bass population.<sup>3</sup>

Now is the time for the Atlantic Striped Bass Management Board (Board) to take bold action to ensure the long-term success of the stock. Since adoption of Amendment 6 in 2003, our understanding of the stock has advanced significantly, and this information can better inform management moving forward. Currently, we are all too aware that previous delays in taking needed management action have resulted in the stock being classified as both overfished and, currently, experiencing overfishing.<sup>4</sup>

HONORARY  
TRUSTEES

Donald F. Boesch, Ph.D.

W. Russell G. Byers Jr.

D. Keith Campbell

Louisa C. Duemling

Richard L. Franyo

Alan R. Griffith

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C.A. Porter Hopkins

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Marie W. Ridder

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Simon Sidamon-Eristoff

Jennifer Stanley

Thomas H. Stoner

Bishop Eugene Taylor Sutton

Alan L. Wurtzel

<sup>1</sup> Chesapeake Bay Program. Striped Bass. [https://www.chesapeakebay.net/issues/striped\\_bass](https://www.chesapeakebay.net/issues/striped_bass). Accessed 10/4/2019.

<sup>2</sup> Code of Virginia. § 1-510. Official emblems and designations.

<sup>3</sup> NOAA. Chesapeake Bay Office. Striped Bass. <https://chesapeakebay.noaa.gov/fish-facts/striped-bass>. Accessed 10/6/19.

<sup>4</sup> Northeast Fisheries Science Center (NEFSC). 2019. 66th Northeast Regional Stock Assessment Workshop (66th SAW) Assessment Report. US Dept Commer, Northeast Fish Sci Cent Ref Doc. 19-08; 1170 p.

We hope the Board will consider the following comments during its deliberations on Amendment 7.

#### 4.1 Management Triggers

CBF feels that management triggers are an important tool that help guide managers' response to changes in the stock. Amendment 6 contained five management triggers that were developed to respond to changes in various components of the population. It was hoped that these triggers would spur action by the Board well before the stock had fallen below the threshold resulting in the need for significant conservation actions.

When voting on which sections of Amendment 7 to adopt, the Board must adopt strong conservation minded triggers that more effectively manage the species going forward. The future health of the striped bass stock depends on swift conservation action, which must be prioritized over regulatory stability when triggers are tripped. In order to ensure that the Board quickly responds to changes in stock status, CBF supports the following options:

##### *TIER 1 OPTIONS: Fishing Mortality (F) Management Triggers*

For Option A: Timeline to Reduce F to the Target: CBF strongly supports **Sub-option A1** which would keep the one-year timeline for reducing fishing mortality to the target F. As evidenced by the results of Board action on Addendum VI prior to the 2020 fishing season, these types of actions can be successful and may be necessary in order to maintain the health of the stock. In this action, the Atlantic states quickly implemented new regulations which met the goal of reducing total removals by 18% relative to 2017 levels in one year.<sup>5</sup>

For Option B: Threshold Triggers: CBF uses the same logic to support **Sub-option B1** which would use the one-year timeline adopted in Option A for reducing fishing mortality below the threshold. By choosing a one-year requirement to take action, we can help to ensure quick management actions that will keep the stock on a healthy track. Providing two years in the name of regulatory stability is the wrong approach given the recent stock status and management history of this species.

For Option C: F Target Triggers: CBF supports **Sub-option C1** which would keep the current Target Trigger for mortality and spawning stock biomass using the timeline adopted in Option A.

##### *TIER 2 OPTIONS: Female Spawning Stock Biomass (SSB) Management Triggers*

For Option A: Deadline to Implement at Rebuilding Plan: CBF supports **Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan**. This would clarify the need for the Board to implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. Because a management trigger is not considered tripped until the Board takes action on the relevant stock assessment, this will help ensure that we don't experience another period of

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<sup>5</sup> ASMFC. States Achieve Required Coastwide Reductions in Atlantic Striped Bass Total Removals Development of Draft Amendment 7 Continues; Board Initiates Addendum to Amendment 6. August 6, 2021



prolonged low abundance as we have seen this species. In addition, selection of Sub-option A2 will align such requirements with those for federally managed fisheries.

For Option B: SSB Threshold Trigger: CBF supports **Sub-option B1** which would require rebuilding of the female spawning stock biomass to the target level within a timeframe not to exceed 10 years.

For Option C: F Target Triggers: CBF supports **Sub-option C1**. If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe (not to exceed 10 years).

### *TIER 3 OPTIONS: Recruitment Triggers*

For Option A: Recruitment Trigger Definition: Because approximately 70 percent of the Atlantic striped bass stock is spawned in the Chesapeake Bay, recruitment in the Bay is of special importance to anyone who cares about striped bass along the Atlantic Coast. Fortunately, each fall, managers and the public get an update on recruitment when the annual striped bass young-of-the-year surveys are released. Unfortunately, these numbers have been concerning—especially in Maryland—over the past three years. In addition, with the anticipated warming due to climate change, the cool, wet springs that tend to lead to more successful spawning events are likely to be reduced.

Given the recent trends in the Bay region and concerns about future climate change impacts, CBF supports the most conservative recruitment trigger of **Sub-option A3**: The recruitment trigger includes both Maryland and Virginia. Knowing this trigger would have tripped six times since 2003 and at least once in each Chesapeake Bay state helps to ensure that use of this trigger would be used to spur management action in response to low recruitment.

For Option B: Management Response to Recruitment Trigger: CBF supports **Sub-option B2**. Under the status quo recruitment trigger, there is no management action required, even if the trigger is tripped. Under this sub-option we anticipate that needed management action will be swiftly implemented when the recruitment trigger and this is unfortunately very likely given issues of low recruitment that have characterized the striped bass stock since the mid-2000s. Such a trigger is meaningless unless it elicits a management response for corrective action. Sub-option B2 ensures that if the recruitment trigger is tripped, the Board will take that low recruitment status into account when considering the appropriate target F.

### *TIER 4 Deferred Management Action*

Considering the more recent history of striped bass management, it is obvious that managers must react faster to changes in the stock, not slower. Although CBF appreciates the logic behind regulatory stability, prioritizing stability now when the stock is in trouble is the wrong approach. CBF supports **Option A: No Deferred Management Action**.

## 4.2 Recreational Fishery Management Measures

An iconic fish along much of the Atlantic Coast, striped bass present the opportunity for many anglers to catch a truly trophy fish either near or far from shore. Not surprisingly, recreational anglers are not only acutely aware of the current diminished status of the striped bass stock, but they are also the sector whose calls for additional conservation measures have often been the loudest. Moving forward, the Board should work to ensure that recreational striped bass fisheries are not only returned to their former glory but also that every opportunity is taken to reduce release mortality in the fishery.

### **Option B. Effort Controls (Seasonal Closures)**

Seasonal closures represent a strong management measure that when implemented at the right time during the fishing season can effectively reduce recreational release mortality. These efforts are especially important in the Chesapeake Bay, where water quality during the summer months can lead to greater than average release mortality due to a combination of high temperatures and low dissolved oxygen. In most cases, reducing the number of fishing trips (effort) interacting with striped bass is key and can be accomplished through seasonal closures. Therefore, CBF supports **Sub-option B1. State-Specific Two-Week Closures**. These closures are especially important when water quality conditions result in “habitat squeeze” for striped bass and release mortality is therefore at its highest. These environmental considerations should be weighed along with the number of trips in each wave to determine the most effective closure periods on a state-by-state basis.

For Tier 1. Applicability of Existing No-Targeting Closures: CBF supports **Option A. Maryland and the Potomac River Fisheries Commission implemented two-week closures during summer periods of high release mortality**. For the purposes of this section, CBF believes the existing no-targeting closures implemented in 2020 are sufficient to fulfill the requirements of sub-option B1. In the future, CBF urges these closures be extended beyond two weeks in order to further reduce angling interactions with striped bass during the summer when release mortality is the highest.

Due to the importance of the Chesapeake Bay region as a spawning area, CBF is supportive of **Sub-options B2-a and B2-b for Sub-option B2. Spawning Area Closures**. These options would prohibit the taking of striped bass from January through April, which is already in effect in the Chesapeake Bay. In addition, since Maryland has already implemented a “no targeting” closure, this will bring regional consistency to recreational fishery regulations.

### **Option C. Additional Gear Restrictions**

Fortunately, here in the Chesapeake Bay only non-lethal devices are allowed to land striped bass. The current prohibition on use of lethal landing devices such as gaffs has wide support from the angling community and should be implemented throughout the Atlantic Coast. Therefore, CBF supports **Sub-option C1. Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of striped bass**. In addition, we support **Sub-option C2: Striped bass caught on any unapproved**

method of take would be returned to the water immediately without unnecessary injury. These additional gear restrictions are simply commonsense and will ensure more striped bass survive catch and release, allowing those fish to continue to positively affect the population in the future.

## **Option D. Outreach and Education**

Many years ago, CBF developed a program titled “Careful Catch” in order to help educate anglers about the importance of ethical and efficient catch and release of fish such as striped bass. In keeping with these efforts, CBF supports **Sub-option D1** which would require states to promote best handling and release practices by developing public education and outreach campaigns. Considering the number of new anglers that enter the sport each year, these types of efforts will not only pay dividends for striped bass, but other managed species as well. States must provide updates on public education and outreach efforts in annual state compliance reports.

### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

Here in the Chesapeake Bay region, we have seen very concerning data on recruitment each of the last three years. Although Virginia’s young-of-the-year surveys have remained at or slightly above the long-term average over the last three years, Maryland has experienced numbers that are approximately half the long-term average.<sup>6</sup> Unfortunately, as our regional waters are warming due to climate change, recent studies have more strongly tied the importance of cool, wet springs to successful striped bass spawning and recruitment.<sup>7</sup> Given these facts, CBF supports **Option B**: Rebuild female SSB to the SSB target level by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

### **4.4.2 Rebuilding Plan Framework**

CBF believes that Section 4.4.2 is one of the most important options in the draft amendment. Including an option that will allow the Board to act quickly in response to the 2022 stock assessment will show stakeholders that the Board is committed to taking strong action that will set a course for success.

Given the importance of maintaining momentum to restore the stock, CBF supports **Option B** which would allow the Board to act via Board action if the forthcoming stock assessment indicates at least a 5% reduction in removals is needed to achieve F target.

### **4.6.2 Management Program Equivalency**

For far too long, conservation equivalency (CE) has provided too much flexibility and not enough conservation gain. These shortfalls in the CE program must be addressed. In order to ensure the appropriate use of CE programs, CBF supports **Sub-option B1-a** and **Sub-Option B1-c** which would restrict the use of CE programs until a stock assessment indicates stock biomass is above the threshold and overfishing is no longer occurring. Additionally, CBF

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<sup>6</sup> <https://chesapeakebaymagazine.com/md-stripped-bass-survey-below-average-for-3rd-year/>

<sup>7</sup> Water temperature during winter may control striped bass recruitment during spring by affecting the development time of copepod nauplii

supports **Sub-option C3**: which would bring additional confidence to the conservation measures associated with CE proposals.

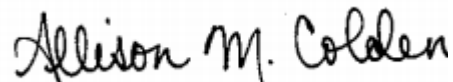
Finally, we support **Sub-option E2** which would ensure that that any proposed state conservation equivalency proposal have the same conservation impact as the coastwide management measures.

Thank you for your consideration of these comments on Draft Amendment 7 to the striped bass FMP. CBF hopes that these comments are helpful in the deliberations by the Board. We know that all stakeholders are very focused on restoring this iconic species in order to provide the many benefits a healthy population will provide all along the Atlantic Coast, which we hope will reverse the trajectory of striped bass decline and start to rebuild this iconic species.

Sincerely,



Chris Moore  
Senior Regional Ecosystem Scientist



Allison M. Colden, Ph.D.  
Maryland Senior Fisheries Scientist

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

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**Melissa Paly**



# Coastal Conservation Association Of New Hampshire

Post Office Box 4372 • Portsmouth, NH 03802  
Phone: (603) 731-2669 • E-mail - [info@ccanh.org](mailto:info@ccanh.org)  
Web Address - [ccanh.org](http://ccanh.org)

April 13<sup>th</sup>, 2022

*Via Electronic Mail (comments@asmfc.org)*

*Re: Striped Bass Draft Amendment 7 Comment*

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

Dear Ms. Franke and members of the ASMFC Striped Bass Advisory Council,

The Coastal Conservation Association of New Hampshire is a non-profit conservation organization comprised of marine recreational enthusiast, fisherman, and concerned citizens. The stated purpose of CCA NH is to advise and educate the public on conservation of marine resources. The objective of CCA NH is to conserve, promote and enhance the present and future availability of these coastal resources for the benefit and enjoyment of the general public.

Striped Bass are a very important species to the members of our organization and our local economy as well. Our region has seen a major decline in size and diversity of year classes. Our hope is that the species will be managed for abundance in the years ahead, for our generation and future generations.

Please find our comments on the Striped Bass Amendment 7 below.

Sincerely

Zakary Robinson, President CCA NH

## **DEDICATED TO CONSERVING NEW HAMPSHIRE'S MARINE RESOURCES**

*The Coastal Conservation Association of NH ("CCA NH") is an unincorporated state chapter of the Coastal Conservation Association ("CCA"), which has over 96,000 members in seventeen states. CCA is a nonprofit, public charity corporation that is qualified under IRC §501(c)(3).*

*Donations to CCA NH are tax deductible under IRC §170.*

## **Striped Bass Amendment 7 Comment**

### **4.1 Management Triggers**

Tier 1

- Sub-Option A1
- Sub-Option B1
- Sub-Option C1

Tier 2

- Sub-Option A2
- Sub-Option B1
- Sub-Option C1

Tier 3

- Sub-Option A2
- Sub-Option B2

Tier 4

- Option A

### **4.2.2 Measures to Address Recreational Release Mortality**

Option C

- Sub-Option C1
- Sub Option C2

Option D

- Sub Option D2

### **4.4 Rebuilding Plan**

#### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

Option B

#### **4.4.2 Rebuilding Plan Framework**

Option B

#### **4.6.2 Management Program Equivalency**

Option B

- Sub-Option B1-a

Option C

- Sub-Option C3

Option D

- Sub-Option D2

Option E

- Sub-Option E2

## **DEDICATED TO CONSERVING NEW HAMPSHIRE'S MARINE RESOURCES**

*The Coastal Conservation Association of NH ("CCA NH") is an unincorporated state chapter of the Coastal Conservation Association ("CCA"), which has over 96,000 members in seventeen states. CCA is a nonprofit, public charity corporation that is qualified under IRC §501(c)(3).*

*Donations to CCA NH are tax deductible under IRC §170.*

From: [Connecticut Surfcasters Association CSA](#)  
Sent: Tuesday, April 12, 2022 9:17 AM  
To: [Comments](#)  
Subject: [External] Amendment 7 choices

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Categories: Auto Replied



4/12/2022

To the members of the ASMFC:

The Connecticut Surfcasters Association is one of the largest saltwater recreational fishing clubs on the Atlantic coast. Our mission statement explains our efforts to “promote, protect and preserve the surfcasting tradition”. Since its inception in the late 1800s, surfcasting has traditionally centered on the pursuit of striped bass with bait, lures and flies. This sport has a rich history, and is a major component of the culture in places such as Cuttyhunk, Montauk, Martha’s Vineyard, Cape Cod, Long Beach Island and the Outer Banks. It occupies a lot of time, and takes in a lot of dollars, from fishermen from Maine to North Carolina who infuse a good portion of their paychecks into the economies of these states by paying for tackle, bait, lodging, food, transportation and the many industries that support these businesses. Surfcasters are a special breed of fishermen, forming their own communities of diehard sportsmen who tend to be a bit obsessive. Many of us cringe when hearing someone speak of our sport as a “hobby”, as it’s more of a lifestyle.

We are very protective and possessive of our fish, our access and our ability to continue to participate in what has been a major part of our lives for so long, and wish to see the opportunities for the same extended to our children, grandchildren and subsequent generations far into the future. The striped bass is too great a resource to squander and be let to slip away.

We’ve watched the fishery diminish and shut down in the late 1970s and early ‘80s, participated in its rebuilding, and watched ASMFC proclaim their success in bringing them back. We enjoyed the increasing numbers of stripers and incredible fishing, which provided an economic boom for tackle shops, fly shops, motels, restaurants, marinas and so many business along the Atlantic seaboard.

And we waited for them to act to reverse a downturn in the spawning stock biomass when it started to shift downward again. And we waited. And we lost faith in the system that we count on to keep our fisheries healthy and productive.

We are done waiting and our faith has diminished as our fish have also diminished. Changes are needed. Now. We need to alter our fisheries management processes to ensure that quick action is taken when things start to sour, rather than watch it continue for another decade or more. We need transparency and accountability, and assurance that the people who are hired to protect our resources will be doing what our tax dollars are paying them for.

We support changes in Amendment 7 of the Striped Bass Management Plan that will be most likely to rebuild our striper stocks most quickly and be most likely to ensure that we won’t have yet another rerun of a sad chapter in the history of the management of one of our most valuable resources. We urge you to choose the options below, as we believe those are the ones that will achieve the best outcome and restore our faith in our fisheries management.

Thank you,

The Members of the Connecticut Surfcasters Association.

Tier 1

Option A: Sub-option A-1

Option B: Sub-option B-1

Option C: Suboption C1

Tier 2:

Option A: Sub-option A2

Option B: Sub-option B1

Option C: Sub-option C1

Tier3:

Option A : Sub-option A2

Option B: Sub-option B2

Tier 4:

Option B: Sub-option B1-a

Option C: Sub-option C3

Option D: Sub-option D2

Option E: Sub-option E2



March 6, 2022

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

Dear Emilie,

I am the founder of the Connecticut Catch and Release Fly Fishing Facebook group which has 1,300 active members. We are a conservation-oriented group that practices catch and release. For years we have been concerned at the depletion of the striped bass fishery and the ASMFC's slow response to what the science has been telling us.

We see striped bass as the flagship saltwater species. We are hopeful that the Striped Bass Management Board will adopt the options which compel the Board to quickly take effective action when the science indicates that action is required. The following are the options recommended by the Connecticut Catch and Release Fly Fishing Facebook group:

- |   |                  |
|---|------------------|
| <b>4.1 Management Triggers:</b>             | Tier 1:          |
|   | - Option A1      |
|   | - Option B1      |
|   | - Option C1      |
|   | Tier 2:          |
|   | - Option A2      |
|   | - Option B1      |
|   | - Option C1      |
|   | Tier 3:          |
|   | - Option A3      |
|   | - Option B2      |
|   | Tier 4:          |
|   | - Option A       |
| <b>4.2.2 Recreational Release Mortality</b> | - Option A       |
|   | -                |
|   | -                |
|   | - Option C1      |
|   | - Option C2      |
|   | - Option D1      |
| <b>4.4.1 Rebuilding Plan</b>                | Option B         |
| <b>4.4.2 Rebuilding Plan Framework</b>      | Option B         |
| <b>4.6.2 Management Program Equivalency</b> | - Sub-Option B1a |
|   | - Sub-Option B1c |
|   | - Sub-Option B2b |
|   | - Sub-Option C3  |
|   | - Sub-Option D3  |
|   | - Sub-Option E2  |

I appreciate your time and attention.

Sincerely,



Tim Sheffield  
Connecticut Catch and Release Fly Fishing Facebook group  
72 Juniper Drive  
Coventry, CT 06238



April 5, 2022

Ms. Emilie Franke, FMP Coordinator  
1050 N. Highland St., Suite A-N  
Arlington, Virginia 22201

RE: Public Comments – Draft Amendment 7, Interagency Fishery Management Plan for Atlantic Striped Bass

Dear Ms. Franke,

Fly Fishers International (FFI) is pleased to provide these “Public Comments” on behalf of our members and the fly fishing community regarding Draft Amendment 7 of the Interagency Fishery Management Plan for Atlantic Striped Bass (IMP). The Atlantic striped bass is a very important game species to our members and the fly fishing community, especially those who live and enjoy fly fishing in the upper Atlantic states. It is for that reason that FFI shares the concerns of the Atlantic States Marine Fisheries Commission (Commission) and our Conservation Partner Organizations regarding the significant decline in quality of this fishery over the past decade, overfishing that is occurring and the need for regulatory and educational measures to reduce post-release mortality. We also are concerned about the need to reduce commercial harvest of menhaden that are essential food for striped bass and other marine fish species.

Fly Fishers International is a global organization that is dedicated to support, enhance and preserve the recreational opportunities and enjoyment of fly fishing for “All Fish and All Waters”. We do this through teaching all aspects of fly fishing and most importantly through our advocacy, demonstration, and voice for conservation of our natural resources.

We commend the Commission for development and implementation of the IMP and most importantly implementing adaptive revisions reflected in Draft Amendment 7 and previous amendments. These revisions are important to assure the IMP improves as new data emerge and we appreciate this opportunity to provide the following comments regarding Draft Amendment 7.

### **Management Triggers and Response Time**

Management Triggers are a very important aspect of the IMP that facilitates evaluation of relative population trends and indicated management actions. This is especially relevant in management of a species experiencing declines and overharvest. Response times are critical.

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It is our understanding that Amendment 7 proposes deferring response times and FFI opposes this provision. Management responses should be immediate to assure timely and adaptive management action when Management Triggers confirm trends that are contrary to sound population health and measures to rebuild stocks are indicated.

### **Recreational Post-Release Mortality**

Fly Fishers International supports “catch and release” of game fish and advocates “safe handling” methods to enhance survival of released fish. We are especially concerned that post-release mortality accounts for the highest percentage of striped bass deaths. We strongly recommend that the Commission implement regulatory actions to require use of barbless, circle hooks for bait and fly fishing and using nonlethal devices to handle and keep fish in water for release. Such regulations have been implemented successfully by the Florida Fish and Wildlife Conservation Commission (FWC) to reduce post-release mortality associated with recreational fishing of three species of marine fish in coastal waters of South Florida. We also recommend the Commission, and its member states, develop materials and programs to advocate and inform recreational fishers of “safe handling” methods they may use to personally enhance survival of fish they release.

### **Spawning Area Closures**

Spawning area closures are another management action that may be used to protect spawning fish to improve recruitment and rebuilding of population stocks. The FWC implemented such a measure in 2021 to close the Western Dry Rocks Spawning Area during a 4-month period to protect permit during spawning. Fly Fishers International recommends the Commission identify such areas and implement regulations to close spawning areas during critical periods to improve recruitment and rebuilding of striped bass stocks.

### **Conservation Equivalency**

Member states of the Commission have the option of submitting alternative striped bass management plans that theoretically achieve the same goals of the IMP but this only adds inconsistency in an already very complex interstate management effort and is not working. Management Triggers are being exceeded, the species is suffering from overharvest and FFI does not support this provision of Conservation Equivalency.

### **Menhaden**

Menhaden is a critical food of striped bass and many other predatory species of marine fish. It also is our understanding that the Commission is implementing measures to reduce the



commercial harvest of menhaden. Fly Fishers International strongly supports implementation of regulations to more equitably balance commercial harvest of menhaden with the forage needs of striped bass and other marine species.

Fly Fishers International thanks the Commission for providing the opportunity to provide Public Comments regarding Draft Amendment 7 of the Interagency Fishery Management Plan for Atlantic Striped Bass. This is an important conservation issue to our members and the fly fishing community, and we respectfully appreciate your consideration of our recommendations.

Sincerely,

Patrick Berry  
President and CEO

David Peterson, Chairman  
FFI Board of Directors

Tom H. Logan, Chairman  
FFI Board Conservation Committee  
Senior Advisor – Conservation

April 11, 2022

Ms. Emilie Franke

Atlantic States Marine Fisheries Commission

Fishery Management Plan Coordinator

1050 N. Highland St., Suite 200A-N

Arlington, VA 22201

Email: [Comments@asmfc.org](mailto:Comments@asmfc.org)

Reference: Striped Bass Management Plan – Draft Amendment 7

Dear Ms. Franke:

The Hi-Mar Striper Club of Middletown (Monmouth County), New Jersey hereby presents its comments on proposed Striped Bass Management Plan Amendment 7. The Hi-Mar Striper Club is one of the foremost Striped Bass fishing clubs in New Jersey. It is comprised of 45 members that not only fish for Striped Bass but are also very concerned about the well-being and sustainability of the Striped Bass stock and ensuring that it remains that way for the future. Hi-Mar Striper Club members have reviewed Draft Amendment 7 and participated in the webinar public meeting on March 14, 2022. Draft Amendment 7 is very comprehensive and contains a great deal of information, including the proposed actions that may need to be taken if Striped Bass is Over-fished and Over-fishing is occurring, in accordance with the management plan.

A prevailing comment by our members as well as many other concerned parties regarding Draft Amendment 7, is that it is difficult to follow, and some have even said “confusing” in regard to the need for actions and the possible actions that may need to be taken to manage Striped Bass.

Furthermore, in the afore mentioned public hearing, specifically during the public question and comment portion of the meeting, and in the responses presented by ASMFC representatives, certain information came to light that causes further concern to the Hi-Mar Striper Club and its members in regard to the proposed actions contained in Draft Amendment 7, the data used to determine the need for these actions, and whether any actions are warranted, at least at this time. Of particular concern, is the fact that Striped Bass stock assessment for New Jersey is based solely on information gathered from Delaware Bay, in the southern part of New Jersey, where Striped Bass fishing has been on the decline for several years. Hi-Mar Striper Club members fish primarily Sandy Hook/Raritan Bay and the Atlantic Ocean off Monmouth County. The Striped Bass fishery and stock in these areas appear to be doing quite well. ASMFC representatives stated that no stock assessment efforts have occurred in these areas, and

efforts to do so are only now getting underway in an area that is a migratory conduit to the Hudson River spawning area.

In addition, although the use of circle hooks has only been mandated for approximately a year, Hi-Mar

Striper Club members and other anglers concerned about the survivability of the stock, complying with size and bag limits, and decreasing mortality, have been using circle hooks for many years. We feel that it has made a positive difference. ASMFC representative's comments were that the use of circle hooks has not had an impact. We question how the effectiveness of the change to circle hooks can be determined in so short a period without any current study being conducted. We also question the manner in which Catch and Release mortality was determined and the extrapolation of the Diodati and Richards (1996) study applied to the entire coastal area is even accurate. That study included fish that were dead before release, and fish that may have appeared fine but later died any cause. The Diodati and Richards study was conducted in a 5 acre saltwater pond with an average depth of 10 ft with no metric or requirement for the use of circle hooks. How that relates to the open ocean has always been a point of contention. Many more factors are involved, but we believe the 9% mortality being used is probably too high and further studies need to be performed.

In summary, although the Striped Bass Management Plan calls for amendment of the plan to better manage the species, the Hi-Mar Striper Club recommends that prior to any actions being taken, especially some of the more drastic actions mentioned in Draft Amendment 7, efforts to better determine stock assessment in other parts of New Jersey, specifically Sandy Hook/Raritan Bay and other areas along the coast be undertaken to provide a more accurate data base to determine what, or if any changes to the management plan are needed. More time is needed to assess the use of circle hooks especially with a Benchmark Stock Assessment scheduled for 2023. The use of circle hooks, mandated by ASMFC, should show a positive decrease in mortality, and play an important part in the management plan. The implementation of the "slot" size in Addendum VI should also improve recruitment by sparing larger more mature females. We also suggest that a mobile app be developed to allow recreational anglers to provide "real time" capture and location data as an input to MRIP.

If the Adoption of the Draft Amendment VII cannot be delayed before there is more relevant data, Hi- Mar Striper Club would like to provide the ASFMC with our preferred choices for the options in the Draft Amendment VII Proposal as follows:

**Tier 1**

- Option A      Sub Option A2
- Option B      Sub Option B2
- Option C      Sub Option C2

**Tier 2**

- Option A      Sub Option A1
- Option B      Sub Option B2

Option C      Sub Option C2

**Tier 3**

Option A      Sub Option A1

Option B      Sub Option B2

**Tier 4**

Option E

Thank you for your consideration

Respectfully,

John Azzinaro

Hi-Mar Striped Bass Club President

For the Board



# HUDSON RIVER FISHERMEN'S ASSOCIATION

P.O. BOX 421 Cresskill NJ 07626 – P.O. BOX 421 Piermont NY 10968

Emilie Franke  
Atlantic States Marine Fisheries Commission  
(Subject: Draft Amendment 7)  
1050 N. Highland Street, Suite 200 A-N  
Phone: (703) 842-0740  
Arlington VA. 22201 Fax: (703) 842-0741

Date:7, March, 2022

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David Mercer

Peter Musse

Miguel Sardinas

Alex Spindelman

Janice Soto

Arnie Ulrich

**Good day Emilie Franke,**

**The Hudson River Fishermen's Association represents over 200 fishing families who use the Hudson River for recreation and fishing.**

**Regarding Draft Amendment 7 for Striped Bass fishing, the Hudson River Fishermen's Association unanimously opposed to closing any spawning areas which we see as one of the options put forth to address recreational release mortality. We would like the regulations to remain Status Quo.**

**Sincerely,**

**Capt. Aram Setian**

**HRFA President 2022**

**Reply Requested**

*Fight for the Hudson*

E-Mail: [president@thehrfa.org](mailto:president@thehrfa.org)

[www.thehrfa.org](http://www.thehrfa.org)



From: [Isaac Schuchat](#)  
Sent: Friday, April 15, 2022 11:11 AM  
To: [Comments](#)  
Cc: [Tom Bradbury](#); [Leia Lowery](#)  
Subject: [External] Draft Amendment 7

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Categories: Auto Replied

Hello Emilie,

On behalf of the Kennebunkport Conservation Trust, I write to you because the ASMFC must take severe action to protect what is left of our striped bass stock. Previous stock management has proven inadequate, reflected by the decline in the overall stock number, and especially in the unbalanced age class structure of the stock. The previous implementation of a slot size for the recreational fishery is perpetuating an imbalance in the age class structure and is not allowing enough mid-sized fish to reach their full potential in terms of fecundity.

We understand that striped bass support a multi-billion dollar industry both in the recreational and commercial sector. However, to prevent a catastrophic long term economic and fishery collapse similar to that of the 1980's, we strongly suggest more stringent measures than those listed under Option B (effort controls and seasonal closures). We support the implementation of a total catch and release fishery until the female SSB exceeds the 2018 target threshold of roughly 250 million pounds.

In addition to a 100% catch and release recreational fishery, we support all measures that promote safe catch and release listed under Option C and D.

Similar to the gear restrictions mentioned in table 10 of the Amendment, we suggest that the use of treble hooks be prohibited in the deployment of bait and artificial lures. To reduce release mortality all devices except non-lethal landing devices should be prohibited. Immediate release of striped bass when caught as incidental bycatch should also be required. State implemented outreach and education programs should be required to promote best practice regarding safe fish handling and catch and release.

At the Kennebunkport Conservation Trust, we work to preserve our land, water, and heritage so that all can be enjoyed by current and future generations. Taking immediate and severe action is necessary to protect the striped bass that we love and enjoy.

Thank you for considering our suggestions.

Sincerely,

Isaac Schuchat and the Kennebunkport Conservation Trust

--

Isaac Schuchat (he/him)

Assistant Director of Programs and Outreach | Kennebunkport Conservation Trust  
[ischuchat@kporttrust.org](mailto:ischuchat@kporttrust.org) | (207) 967 - 3465 x 110





April 15, 2022

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

Dear Ms. Franke and members of the Striped Bass Board,

Thank you for the opportunity to provide feedback on the Draft Amendment 7 to the Interstate Management Fishery Plan for Atlantic Striped Bass on behalf of the 60 members of the Maine Association of Charterboat Captains. The striped bass fishery in Maine is a shadow of what it was and could be. The Striped Bass Board has an historic opportunity with this new Amendment to make decisions that give us the best opportunity to return this fishery to what it should be.

Our "official" comment is the letter authored and submitted by the American Saltwater Guides Association (ASGA). We signed onto that letter not as a secondary indicator of support, but as our statement on behalf of a broad and diverse group of for-hire operators. Since we signed onto that letter, we've seen an encouraging groundswell of industry support for the positions we hold in common.

Here in Maine, striped bass are to charterboat operators as lobster are to commercial harvesters. Some of our members run trips for groundfish, others target bluefin tuna and sharks, but almost all of our captains depend upon striped bass in whole or in part to remain viable businesses. We need a rebuilt fishery managed for long-term abundance and stability.

Our organization has been involved in advocating for responsible striped bass management since our inception and will continue to do so as long as our industry exists. We trust that ASMFC staff and members of the Striped Bass Board will recognize the input of the Maine Association of Charterboat Captains into this process as expressed by the American Saltwater Guides Association comment letter.

Sincerely,

Capt. Peter Fallon  
President, Maine Association of Charterboat Captains  
[207] 522-9900  
pfallon@mainestripers.com

From: [Bob Munro](#)  
Sent: Friday, April 15, 2022 9:34 AM  
To: [Comments](#)  
Cc: [munrore@aol.com](mailto:munrore@aol.com)  
Subject: [External] Draft Amendment 7

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Categories: Auto Replied

In case no one from the Maryland Charter Boat Association submitted the following comments in electronic form, please find below. Regards, Bob Munro

### ASMFC Amendment 7 Statement

The Maryland Charter Boat Association is the largest group of professional Captains on the Chesapeake Bay who promote sustainable sport fishing and local tourism. We are small business owners and family businesses that operate in your community.

Over the past two seasons we have continued to build our relationship with the State of Maryland and have participated in the Fishing Activity & Catch Tracking System (FACTS) reporting system as professional fishermen. The hope of our reporting is to assure that fishery managers receive accurate data in real time.

In an act of preservation, in 2020 the State of Maryland acted to reduce harvest of Striped Bass by 18% and a total of 28% including Commercial harvest. Consequently, our industries season was shortened in a three phase effort to help rejuvenate the Striped Bass population. In summary: 13 days of our Spring Fishery were eliminated, 16 days of our Summer Fishery were canceled, and the last 5 days of our Winter Fishery were closed. This effort that was once available to us as anglers can also be seen in Amendment 7's public comment on page 61 based on the 2019 data set. The alterations to the season will continue into 2022.

We are thankful for our partnership with fishery management staff within the Maryland Department of Natural Resources. This partnership has afforded us the opportunity to continue to fish within our current 6 month, 3 week Striped Bass Season.

Our concern, year in and year out is what is next? What will impact our businesses? Will we be able to operate in Maryland as an industry if proposed regulations continue to shorten our seasons and daily harvest limits?

We know as an industry that we have met the proposed Option B1-A effort controls proposed by ASMFC in Amendment 7. We feel that any other additional closure in the Chesapeake Bay for the For-Hire fleet is unnecessary due to our already-abbreviated season. Our industries business

model is reliant on a fishery that attempts to avoid unnecessary catch and release, or handling of Striped Bass. We are professional fisherman and utilize the best fishing practices and gear to avoid additional unnecessary discards during our trips. We feel that shifting to a one fish per angler limit for the for-hire fishery will not only result in unnecessary catch and release but will deter future customers from wanting to participate as anglers on our vessels.

Though our portion of the total Striped Bass harvest is minimal in comparison to the total data set, it should be the most accurate based on its parameters. To elaborate, as professional fishermen we have been asked over a two year period to log not only harvest data of all species through the FACTS Reporting System, but all releases, methods, and even bait caught. This comprehensive data set was recorded per trip and verified by random surveys by Maryland Department of Natural Resources employees. These employees were given our estimated check in time back at the dock with advanced notice during each trip. Our customers also took surveys after each trip when requested by state employees to verify our harvest data accuracy and their personal fishing history within the past season.

Not only have our Captains and Crew have been willing to better this fishery, our customers have devoted their time to it as well.

As Maryland Captains on the Chesapeake Bay we are the most concerned fisherman about the health of our fishery and the volatility of potential management decisions year after year. We feel that we have continued to sacrifice a large portion of our once-open season to accomplish fishery managers' goals. We feel that our For-Hire harvest data are as accurate and predictable as the commercial fishery. In comparison, we harvest roughly an estimated third of what the total commercial sector harvests annually (Number of fish Harvest by For Hire Charter Boats - Year 2018: 174,737, 2019: 167,203; 2020: 146,290, 2021: \*139,460 (\*as of end of November 2021) reports received April 6, 2021 & December 2021 from Public Information request). When comparing harvest records as an industry from 2018 vs 2021 's supplied data we have reduced our harvest by 25.3%.

As professional fishermen we strongly believe our release mortality rate is equivalent to or lower than the commercial fishery in Maryland. As professional fisherman we understand the correct way to handle and release fish. We are professional fisherman that hold the same credentials as all commercial fisherman. We all are required to own a Tidal Fish License or a Guide's License to participate in our fishery. There is absolutely no logical reason why we as professional fisherman are considered to have a higher release mortality than our colleagues in the commercial fishery. The unique ability to manage our fishery and understand the differences between the mortality of professional fishermen and recreational fishermen are key principles that are only defined through Conservation Equivalency. The rationale that we are reliant on Marine Recreational Information Program (MRIP) data estimates and not our own reporting harvest system creates even more division and opportunity for error in the Chesapeake Bay.

As professional fishermen we are well aware of the ever-changing dynamics of the Striped Bass Fishery on the Chesapeake Bay. We understand the regional differences and opinions that are proposed year after year. We understand the opinions of the recreational fishermen and commercial alike. We understand Maryland's uniqueness in the entirety of the Striped Bass fishery on the East Coast of the United States and support our opportunity to use Conservation Equivalency to manage its fishery.

We understand that personal observation of migration patterns through harvest data has changed, fishery biomass during seasons has changed with Chesapeake Bay health (as a result of depleted oxygen levels from algae blooms and pollution from multiple states). Additionally, predators have affected the fishery (including invasive species such as Blue Cat Fish & Snake Head), increasing observations of schools of Porpoise are natural predators and affect the location of the Striped Bass biomass in the Mid-Upper Chesapeake Bay during the Summer months, etc.), and climate change has affected the timing of the Spawning Stock Biomass, etc.

We also understand that continued aggressive regulation demands sacrifice. As business owners, we have made the sacrifice already and continue to do so. We feel that our harvest data can be utilized to better the health of the bay and that our industry has been willing to make our best efforts to do so within reason. We feel that we are already operating within the required reduction of 15% directed trips that is proposed in Amendment 7 and the harvest data to be released in October will only support this effort made by our Captains.

We also know that the urgency and option to quickly push an objective through without public comment after October of this year is not in the interest of recreational, For-Hire, or Commercial fishermen. This should be a developed process that is given enough time to mature and allow for the participation of all parties of interest with the new data set in hand. The proposal to do so is unwise and a radical conclusion.

We support regional conservation efforts; we are stewards of Maryland's State Fish and sportsman alike. We support the betterment of the Chesapeake Bay's fishery and have done so historically through action and our recorded efforts. We understand the uniqueness of Maryland's fishery in comparison to the related Atlantic States and understand the importance of honoring Conservation Equivalency. We are fully vested business owners that are reliant on Maryland's State Fish in order to operate and are hopeful that our season will be restored through the principles of its current management strategy.



**Massachusetts  
Striped Bass Association**

*Since 1950*

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

April 11, 2022

Dear Emilie Franke,

**RE: Public Comment on Draft Amendment 7 to the Atlantic Striped Bass FMP**

I submit this letter on behalf of the hundreds of recreational fishing families, for hire operators and commercial harvesters that make up the membership of the Massachusetts Striped Bass Association. These comments were developed via process in which our entire membership was invited to provide input and a public meeting at which Dr. Mike Armstrong presented & answered questions. The following positions were then discussed and voted upon by the over 50 members in attendance. These are the formal positions of MSBA.

***4.1 Management Triggers***

**Tier 1 Options: Fishing Mortality (F) Triggers**

MSBA overwhelmingly supports continued use of the management strategy that manages striped bass with a Target reference point that is more conservative than the Threshold (overfishing) reference point.

A majority of MSBA members support Sub-option A2. These members suggest when the Target reference point is triggered; implementing measures to achieve the Target within 2 years is reasonable.

A lesser number of members but not an insignificant number believe 2 years is too long in a striped bass fishery that is in significant decline. These members support Sub-option A1.

MSBA supports Sub-option B1 (status quo)

MSBA supports Sub-option C1 (status quo)

**Tier 2 Options: Female Spawning Stock Biomass (SSB) Management Triggers**

MSBA supports Option A2. We feel delay has been an issue in striped bass management and two years is reasonable time to implement any management action.

MSBA supports Option B1 (status quo)

MSBA supports Option C1 (status quo)

**Tier 3 Options: Recruitment Triggers**

MSBA supports Sub-option A3...In addition MSBA believes juvenile indices as some of the most reliable science related to predicting the future of the striped bass fishery. We encourage ASMFC to increase focus on recruitment triggers in management.

MSBA supports Sub-option B2

**Tier 4 Options: Deferred Management Action**

The MSBA membership overwhelmingly supports Option A (status quo): No Deferred Action. We feel ASMFC must stop the practice of creative delay of any kind when a trigger has been hit.

**4.2 Recreational Fishery Management Measures**

**4.2.1 Size Limits, Bag Limit and Seasons**

MSBA supports continued use of these management tools.

**4.2.2 Measures to Address Recreational Release Mortality**

MSBA supports Option A and urges ASMFC to continue the Addendum VI circle hook measures.

MSBA is opposed AT THIS TIME to Option B entirely as we feel options for both Seasonal Closures & Spawning Closures for striped bass are underdeveloped and require improvement before more serious discussion and consideration. We encourage ASMFC to prioritize development of ways that both seasonal & spawning closures might be implemented in the future.

MSBA supports Option C. Additional Gear Restrictions

MSBA supports Option C1as is already the case in the Commonwealth of Massachusetts.

MSBA is opposed to Option C2. The number of methods used to fish for striped bass are truly more than most fishery managers can comprehend. States, regions, towns, beaches, estuaries, rivers etc all have local nuance that would make creating an accurate list of current methods in use nearly impossible. Even if such a list could be created; the vast amount of staff time required to conduct even a rudimentary analysis of which current methods would be approved or disapproved would be overwhelming and have significant social and economic consequences. To repeat; MSBA is opposed to Option C2.

MSBA is Opposed to inclusion of Option D in any way shape or form. Some of our members are offended by the way this so-called option is presented for consideration. Of course, Information & education programs are needed HOWEVER this option offers zero information beyond the words "Information" and "Education". BEFORE considering a requirement that all states develop an information & education program that can be measured for compliance; common sense indicates a need to development some sort of a standard to be measured. Considering a 5 minute google search reveals all ASMFC members states have some sort of I&E program in place; this option is a waste of ASMFC staff time and resources.

**4.3 Commercial Fishery Management Measures**

MSBA chooses to remain silent on this section.



## 4.4 Rebuilding Plan

### 4.4.1 Recruitment Assumption for Rebuilding Calculation

MSBA supports Option B. To deny striped bass are in a low recruitment situation is bizarre and we feel the methods of calculation described in option B are needed at this time.

### 4.4.2 Rebuilding Plan Framework

MSBA members believe the striped bass stock is in worse shape than indicated in the analysis that justified launch of this Amendment. We anticipate the 2022 stock assessment will reveal continued decline in the stock and possibly recruitment failure. We support the idea that ASMFC needs to be ready to take swift action IF the assessment indicates recent actions have failed to prevent overfishing during significant decline in recruitment.

MSBA members are not all in favor of pre approving actions without significant public input HOWEVER we feel the pending stock assessment may reveal an emergency situation and if that is the case, the decision to support Option B is easy. MSBA TRUSTS THAT ASMFC & MEMBERS TATES WILL DO THEIR BEST TO SOLICIT PUBLIC INPUT IF THIS POTENTIAL ACTION IS REQUIRED.

## 4.6 Conservation Equivalency

### 4.6.2 Management Program Equivalency

MSBA members overwhelmingly believe Conservation Equivalency Programs should NOT be allowed for striped bass.

MSBA realizes ASMFC is likely to allow CE programs which is why we provide the following input. In order to allow any state to propose a CE program we urge ASMFC to adopt strict regulations that FIRST Require any CE program include pre-determined metrics that will measure & judge both effectiveness & accountability and 2) Any CE program must be held to significantly more strict tolerances than those of the management plan.

MSBA reluctantly prefers Option B.  
MSBA reluctantly prefers Sub-options B1-a, B1-b & B1-c  
MSBA reluctantly prefers Sub-options B2-a, B2-b & B2-c  
MSBA reluctantly prefers Sub-option C3  
MSBA reluctantly prefers Sub-option D3  
MSBA reluctantly prefers Sub-options E2

MSBA appreciates and thanks the ENTIRE ASMFC Staff along with all members of the ASMFC Atlantic Striped Bass Management Board for their ongoing stewardship of Atlantic Striped Bass.

On behalf of our entire membership, we thank you for your consideration of our expert opinions on these important issues.



Mike Jones  
President  
MA Striped Bass Association



Patrick Paquette  
Govt Affairs Officer  
MA Striped Bass Association



Native Fish Coalition  
PO Box 10  
Pownal, ME 04069  
[Info@NativeFishCoalition.org](mailto:Info@NativeFishCoalition.org)

April 13, 2022

To the Atlantic States Marine Fisheries Commission:

We are writing on behalf of the Massachusetts Chapter of Native Fish Coalition (NFC) to comment on draft Amendment 7 in regard to the Interstate Fishery Management Plan for Atlantic striped bass. NFC is a national 501(c)(3) non-profit conservation organization whose mission is to protect, preserve and restore wild native fish. NFC currently has chapters in Alabama, Connecticut, Georgia, Maine, Massachusetts, New Hampshire, Ohio, Pennsylvania, South Carolina, Vermont, and West Virginia.

NFC recognizes the ecological importance of Atlantic striped bass and believes that restoring a healthy stock made up of multiple year classes and natural abundance is critically important for sustainability of the population. On April 9, 2021 NFC MA sent ASMFC our response letter with our comments on the proposed amendment. Below are our positions on some of the proposed options to protect the stock in regard to 4.1 Management Triggers, 4.2.2 Measures to Address Recreational Release Mortality, 4.4 Rebuilding Plan and 4.6.2 Management Program Equivalency. We believe these are important considerations in regard to protecting Atlantic striped bass and rebuilding the population.

#### **4.1 Management Triggers**

##### **Tier 1: Fishing Mortality (F) Triggers**

Option A: NFC supports Sub Option A1 (status quo) Reduce F to a level that is at or below the target within 1 year. NFC believes that immediate action is imperative.

Option B: NFC supports Sub Option B1 (status quo) If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

Option C: NFC supports Sub Option C1 (status quo) If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

NFC believes that these triggers and timelines to reduce F and adhering to the timelines outlined in the options above will be the best course of action to reduce F as well as protect the spawning stock SSB. Time is not on our side in regard to restoring a healthy striped bass stock. We must be proactive not reactive in regards to protecting these fish.

## **Tier 2: Spawning Stock (SSB) Biomass Triggers**

Option A: NFC supports Sub Option A2. Two Year deadline to Implement a rebuilding plan. The Board must implement a rebuilding plan within two years from when an SSB based management trigger is tipped.

Option B: NFC supports Option B1 (status quo). If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10 years].

Option C: NFC supports Sub Option C1. If the female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10 years].

NFC recognizes the importance of protecting the SSB stock. When the SSB stock is diminished it is imperative the management plan gets adjusted swiftly to protect the fish. Delayed response to the triggers is only hurting the SSB.

## **Tier 3: Recruitment Triggers**

Option A: NFC supports Sub Option A. The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA) shows an index value that is below 75% of all values in the respective JAI from 1992-2006, which represents a period of high recruitment for three consecutive years.

Option B: NFC supports Sub Option B2. If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

NFC believes the recruitment trigger needs to be adjusted to protect the juvenile striped bass stock. Rebuilding the stock will be dependent on the juvenile striped bass population, and the triggers need to be adjusted to protect and ensure a stable population of striped bass.

## **Tier 4: Deferred Management Plan**

Option A: NFC supports Option A (status quo). No deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

NFC feels that the time is now in regard to a formal management plan for the Atlantic striped bass. As mentioned above, a reactionary plan is not going to help striped bass, the ASMFC must act swiftly when these triggers get tipped.

#### **4.2.2 Measures to Address Recreational Release Mortality**

##### **Option C. Additional Gear Restrictions**

NFC supports Sub Option C1. Recreational anglers would be prohibited from using any device other than a non lethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

NFC supports Sub Option C2. Striped bass caught on any unapproved method of tackle would be returned to the water immediately and without injury.

##### **Option D. Outreach and Education**

NFC supports Sub Option D2. It is recommended states continue to promote best handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports.

NFC realizes that recreational angler catch and release mortality is a contributor to F. Implementing tackle restrictions and eliminating harmful practices such as the use of gaffs, while promoting practices such as net and release would help reduce incidental mortality. Improvements to tackle allows for oversized or under slot fish to be safely released. Focusing on educating anglers to the benefits of low-impact practices as well as the need for a stable population and stock of SSB and juvenile striped bass will be extremely beneficial in protecting these fish.

#### **4.4 Rebuilding Plan**

##### **4.4.1 Recruitment Assumption For Rebuilding Calculation**

NFC supports Option B. Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis. NFC believes that we need to act now and begin to work on the rebuilding of the striped bass stock. With such low recruitment numbers coming out of the Chesapeake Bay we believe Option B is the best course of action in regard to rebuild.

#### **4.2.2 Rebuilding Plan Framework**

NFC supports Option B. 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 recruitment assumption specified in Amendment 7) 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. We feel this allows the board to act quickly in response to the upcoming stock assessment in October. The time to act is now and we believe delaying responses to these reports is only detrimental to the fish.

#### **4.6.2 Management Program Equivalency**

##### **Option B. Restrict Use of Conservation Equivalency (CE) Based on Stock Status**

NFC supports Sub Option B1-a. CE programs would not be approved when the stock is at or below the biomass threshold (i.e. overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

##### **Option C. Precision Standards for MRIP Estimates Used in CE Proposals.**

NFC supports Sub Option C3. CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%

##### **Option D. CE Uncertainty Buffer for Non Quota Managed Fisheries**

NFC supports Sub-Option D2. Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

##### **Option E. Definition of Equivalency For CE Proposals With Non-Quota Managed Fisheries**

NFC supports Sub-Option E2. Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state specific level.

NFC believes these restrictions on CE will benefit the striped bass. We feel that CE has allowed states to not meet their conservation goals as well as been detrimental to the rebuilding of the striped bass stock. We believe the fishery needs to be managed for natural abundance and age distribution.

Thank you for your time and consideration.

Sincerely,

Native Fish Coalition, Massachusetts Chapter

CC: NFC National Board

From: [G2W](#)  
Sent: Monday, March 28, 2022 9:35 AM  
To: [Comments](#)  
Cc: [Emilie Franke](#)  
Subject: Fw: [External] Draft Amendment 7 Response

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Categories: Auto Replied

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From: Tom Johnson <tjohnsononfly@yahoo.com>  
Sent: Thursday, March 24, 2022 11:00 AM  
To: G2W  
Cc: Emily Bastian; Bob Mallard; Brian Rhea; Daniel Swallow; Peter Gerard; Larry Bastian; Richard Yvon; Robert Dalton  
Subject: [External] Draft Amendment 7 Response  
Atlantic States Marine Fisheries Commission

Megan Ware & Emily Franke

Thanks for hosting this forum to get feedback on your Draft Amendment 7 proposal choices regarding management decisions that will effect your responses in dealing with the conservation and preservation of Maine's Striped Bass.

On April 9, 2021 we sent ASMFC our response letter commenting on Amendment 7 regarding the Interstate Fishery Management Plan for Atlantic Striped Bass. Please review our replies to issues 1 through 9 which answer most of the concerns that were asked at this Maine forum meeting.

In regard to the four main issues discussed it was clear from the 40 - 50 on line participants that DMR needs to respond more quickly to triggers that show a reduction in striped bass populations throughout the Maine watershed. Most also agreed that DMR needs to do a much better job at outreach and education so that anglers and guides better know the rules and regulations that directly effect the health and welfare of striped bass. This includes the best practices for catch & release and illustrating the advantages of using inline circle hooks with the use of bait and single hooks for lures. Treble hooks can cause significant damage to fish and prolong the time the fish is out of water before release. It would be prudent to at least hand out pamphlets that show these life-saving practices when anglers apply for fishing licenses. So the focus should be on tackle restrictions, daily bag limits and practices that reduce incidental mortality. We also support closures to fishing at spawning grounds (specifically the Kennebec river).

Not discussed but what's also very important is that striped bass should be classified as a gamefish. A healthy recreational striped bass fishery contributes significantly more to local and regional economies than a commercial fishery.

Native Fish Coalition appreciates the opportunity to comment on Maine's Draft Amendment 7 and urges the commission to take swift action to restore and protect Atlantic striped bass stocks.

Sincerely,

Tom Johnson  
Chair, Maine Chapter Native Fish Coalition

CC: NFC Board

Sent from my iPhone

From: [Jack Fullmer](#)  
Sent: Friday, April 15, 2022 11:30 AM  
To: [Comments](#); [Jeff Brust](#); [JACK FULLMER](#)  
Subject: [External] Draft Amendment 7 - Atlantic Striped Bass

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Categories: Auto Replied

Emilie Franke  
ASMFC

The New Jersey Council of diving Clubs is an organization of 14 sport diving clubs in NJ with a few clubs in nearby states. I noticed on page 64 under sub-option C1 the statement is made that, "Recreational anglers would be prohibited from using any device other than a nonlethal device to remove striped bass from the water or assist in the releasing of a striped bass." My concern is that wording could be construed to apply to recreational spearfishing. Recreational spearfishing is permitted in all states from Mass. to Florida. New Jersey has a long history of spearfishing for striped bass along the jetties going back to the 1950s. Although the wording is intended for gaffs, it could be interpreted to be directed against spearfishing. Please make it clear that it does not apply to recreational spearfishing.

Respectfully  
Jack Fullmer  
jf2983182@msn.com Legislative Committee

NJ Council of Diving Clubs  
526 S Riverside Drive  
Neptune, NJ 07753





# Northeast Charterboat Captains Association

66 High Road ⚓ Newbury, MA 01951 (978) 465-2307

March 27, 2022

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

## **RE: Draft Amendment 7 Comments**

Please accept the following comments on behalf of the Northeast Charterboat Captains Association (NCCA), an organization of marine-oriented businesses (primarily charter fishing boats) based in Massachusetts, New Hampshire and Maine, concerning Draft Amendment 7 to the Atlantic Striped Bass Fishery Management Plan.

### **4.1 Management Triggers**

**Tier 1 Fishing Mortality Management Triggers:** NCCA supports Sub-option A2, Sub-option B2, and Sub-Option C2. NCCA selected these options for several reasons. First, utilizing multiple years of fishing mortality estimates which are heavily driven by MRIP, helps increase the confidence in the fishing mortality determination. By its design, MRIP is more accurate over multiple years. Second, these options, by providing more time to design a management response, would increase the likelihood that the results of a stock assessment will become available and help better decisions. Finally, we believe there is value in utilizing a less reactive approach with the fishing mortality triggers. With the overwhelming source of mortality being attributed to released fish in the recreational sector and with discards carrying the higher percent error relative to harvest through MRIP, it clearly makes sense to utilize more years of data before taking action. The selected options are also cons.

**Tier 2 Female Spawning Stock Biomass Management Triggers:** For Option A, NCCA supports Sub-option A1, status quo. Referring to the options supported in Tier 1, NCCA believes that action taken under Tier 1, Sub-option A2 would produce an adequate management response necessary to initiate rebuilding.

For Option B, NCCA supports Sub-option B1. With striped bass being a slow growth, long-lived species with female SSB that does not display significant annual variation, we believe that one year below the SSB threshold is a good indicator that action should be taken. NCCA does have issues with the current biological reference points, including the SSB thresholds, and

believes they are too high but we do not support addressing excessively high reference points through a management band-aid. NCCA hopes the reference points can be addressed through the 2025 benchmark stock assessment.

For Option C, NCCA supports Sub-option C3. NCCA believes management of fishing mortality should be the driving principle in striped bass management. This belief is based on the fact that much of the rebuilding success of striped bass is dependent upon environmental factors. Furthermore, we are not confident that variability around a biomass target should prompt an immediate management response.

**Tier 3 Recruitment Trigger Definition:** NCCA supports Sub-option A1. Recruitment success has proven to be highly influenced by environmental factors with no clear stock recruitment relationship. NCCA believes the current criteria for recruitment triggers is adequate. This is further confirmed in Table 2 which illustrates that options A2 and A3 would have exceeded recruitment triggers during years when the biomass was at very high levels of abundance. Taking action during those years would have not been appropriate and would have led to significant increases in regulatory discarding.

For Option B, NCCA supports Sub-option B1 which would maintain the status quo approach for management response when a recruitment trigger is tripped

**Tier 4 Deferred Management Action:** NCCA supports Option B which would allow management action to be deferred until the next assessment. We believe it is essential to allow adequate time for management actions to have their intended impact on fishing mortality before further action is taken. Fishing mortality can only be evaluated in an assessment update or benchmark assessment.

#### **4.2 Recreational Fishery Management Measures**

Mortality associated with releasing striped bass is now the largest source of mortality (54%) but NCCA clearly acknowledges that release mortality does have value in this fishery. Mortality associated with discarding is the biggest fishing related issue impacting the stock and NCCA finds it extremely disconcerting that Amendment 7 provides very little, if any, detailed information on the potential outcome of options presented to address the primary source of mortality in this fishery. Noting that release mortality is the primary source of mortality in the striped bass fishery, NCCA is opposed to measures that would negatively impact recreational harvest.

NCCA is frustrated that measures currently in place and implemented through Addendum VI to reduce recreational discard mortality through the use of circle hooks when fishing with bait have not been quantified. While we understand intuitively that the use of circle hooks should provide benefit to the stock, it is unfortunate that the performance of this management action cannot be determined. Therefore, 9% is still the standard used for recreational caught striped bass that are released and are assumed to die when thrown back. This is an average value that can swing widely based on the gear type, length of fight, air/water temps, handling, injury etc. Yet, this document does not give us the information to make informed decisions to address these



various known factors that impact realized release mortality values in the recreational striped bass fishery.

In a similar fashion, NCCA is dismayed that Amendment 7 does not include any information on the reduction to release mortality or overall fishing mortality that may be achieved through a seasonal or spawning area closure. Considering the potential disruption and socioeconomic impact that a prohibition on targeting striped bass may have, NCCA cannot support a closure until those impacts and benefits can be quantified. Likewise, NCCA also believes it is necessary to be able to determine the effectiveness of a closure, if implemented, so the public can determine if its use is having the desired effect.

NCCA finds it unfortunate that Amendment 7 does not include data on the composition or the cause of recreationally released striped bass. It is critical to understand what drives anglers to discard a striped bass...was it a regulatory response or was it a voluntary action? Knowing this information is essential for the public to determine if the resented options make sense and address the real issues. Therefore, NCCA is not in a position to support any options in this section to address release mortality beyond those measures adopted by Addendum VI. NCCA does support greater outreach and educational efforts to inform anglers on how to reduce their own release mortality rate such as better handling practices and perhaps self-regulating catch and release knowing that for every 12 fish released, 1 was killed (on paper). NCCA believes this outreach is best achieved in partnership with and through the industry, particularly the fishing media outlets.

NCCA does think it is important to note that Amendment 7 is clear that reductions to harvest will have limited success in reducing fishing mortality. Harvest is not the problem at this time and cuts to recreational harvest stand to have little if any management benefit. Given the lack of information and inability to measure performance, NCCA cannot support any further options to reduce discard mortality at this time. Therefore, NCCA supports Option A.

#### **4.4 Rebuilding Plan**

NCCA is very concerned about the ability to rebuild the striped bass biomass to the SSB target by 2029. It's important to recognize two key points. First, in the history of this fishery, female SSB has never reached the rebuilding target, even in 2003 when the stock reached the highest biomass value in recorded history. This inability to meet the current rebuilding target clearly demonstrates that the biological reference points including the rebuilding target are not realistic. Second, in recent years, the striped bass population has been less productive than it was when the rebuilding targets were established. This means that fishing mortality is having less direct impact on rebuilding progress observed in the stock. It seems highly unlikely that the stock will be rebuilt by 2029. But since the ASMFC does not control environmental factors and still uses a fixed natural mortality value, the only recourse they can take when rebuilding lags is drastic cuts to fishing regulations. Perhaps a question that needs to be asked in Amendment 7 is if we can't rebuild by 2029 without imposing massive restrictions on the fishing community, should we be happy with the current status of the stock and just try to manage F? NCCA has a hard time supporting any of the rebuilding options in the document because we feel that we are being set up for failure with this fishery. We believe it is imperative that the biological reference

points are revisited in the next benchmark assessment 2025 before selecting a management response.

#### **4.6 Management Program Equivalency**

NCCA supports Option A which would allow the continued use of conservation equivalency. Amendment 7 provides no real data that demonstrates that a CE performs any differently than coastwide measures, therefore, we find it impossible for the public to make an informed decision on this important management tool. Amendment 7 talks about a 'concern' about the performance of CE measures that states have utilized over the years. However, if there has not been an analysis performed to determine if CE works better or worse than coastwide measures, the concern is only 'perceived' in nature, not an actual concern. CE has proven to be the very tool that gives the states the flexibility to craft their own measures based on the input and needs of their fishermen. NCCA generally views the option of giving states the ability to draft and implement preferred management measures specific to their needs over centralized mandates.

NCCA sees no need to apply specific criteria to CE use as by its very definition, is equivalent and therefore makes no difference if it's used when the stock is high or low. It is important to remember that CE proposals go through Technical Committee review prior to approval.

From the perspective of recreational release mortality, denying the use of CE would absolutely increase the number of discarded striped bass in most states. Amendment 7 is very clear in identifying the largest source of mortality in this fishery is recreational release mortality. By withdrawing the use of CE would only add to the greatest source of mortality.

Thank you for the opportunity to provide comments and for considering NCCA's input on this important issue.

Sincerely,

*Capt. Peter Murray*

Capt. Peter Murray, President  
Northeast Charterboat Captains Association

February 24, 2022



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

Dear Emilie,

I offer this public comment representing the New York Coalition for Recreational Fishing (NYCRF) and its close to 2,000 members. The NYCRF is a non-profit organization dedicated the conservation and preservation of our marine resources and expanded fishing access.

The selected options below were influenced by several factors:

- The striped bass fishery has been on a downward trajectory for well over 10 years. The Striped Bass Management Board has demonstrated a consistent reluctance to take timely, effective action in managing one of the most important species under the ASMFC's control. We have little faith that this Board will take the necessary action to rebuild the striped bass fishery without a guiding document that compels the Board to act.
- Given this lack of trust, any option within the Draft Amendment that provided the Board with any discretion to not act when the science indicates that action is required was immediately discounted. If the best available science indicates that the fishery is in trouble the NYCRF has opted to endorse options that obligate the Board to act and act quickly.
- Options that are not easily enforceable are destined to fail. As written in the Draft, the effort closures unfortunately fall into this category. If necessary, effort closures can always be addressed more effectively through an Addendum.
- This Board has a history of not applying an adequate level of risk management or margin of error to their management decisions. When a fishery is experiencing significant depletion, recommending solutions that only have about a 50% chance of being effective is just not sufficient.
- While striped bass anglers should be recognized for releasing 90% of the fish that are caught, it is estimated that 9% of released fish do die. All reasonable efforts should be made to minimize this percentage as much as possible and this includes providing better education on how to reduce release mortality.

The NYCRF endorses the following Draft Amendment 7 options:

#### **4.1 Management Triggers:**

Tier 1-Fishing Mortality Management Triggers

- Option A1
- Option B1
- Option C1

Tier 2-Female SSB Management Triggers

- Option A2
- Option B1
- Option C1

Tier 3-Recruitment Triggers

- Option A3
- Option B2

Tier 4 Deferred Management Action

- Option A

**4.2.2 Recreational Release Mortality**

- Option A
- Option B1: Not in favor
- Option B2: Not in favor
- Option C1
- Option C2
- Option D1

**4.4.1 Rebuilding Plan**

- Option B: Use low recruitment regime assumption (although an average of the standard recruitment method and the low recruitment regime seems more appropriate)

**4.4.2 Rebuilding Plan Framework**

- Option B

**4.6.2 Management Program Equivalency**

- Sub-Option B1a
- Sub-Option B1c
- Sub-Option B2b
- Sub-Option C3
- Sub-Option D3
- Sub-Option E2

At the ASMFC 2021 Spring Striped Bass Management Board Meeting ASMFC Commission Chair Pat Keliher was totally on point when he noted “I would say we’ve likely had mixed results over the years. That brings us to today, I feel there is a lot at stake, not only for striped bass, but ASMFC as well. Some are stating that the Commission has a credibility problem, that we’ve taken our greatest fisheries management success story and reversed it... Today I would ask this Board to think about what is best for the species, but also what is best for the future of the Commission. I suspect that this will be a painful discussion, and sacrifices needed to find a path forward. The small amount of pain now pays us dividends down the road.”

Our hope is that these words will guide the Striped Bass Management Board as they finalize Amendment 7.

Sincerely,



Ross Squire  
President, New York Coalition for Recreational Fishing  
ross@nycrf.org



## New York State Conservation Council, Inc.

1060 Broadway #1090, Albany, New York 12204

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

Dear Ms. Franke:

The New York State Conservation Council, Inc. (NYSCC) is providing the following comments on the Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass.

NYSCC is a non-profit corporation organized in 1933, which advocates for natural resource conservation on behalf of the sportsmen of the State of New York. Its taking a position on the draft amendment, it is guided by the following principles:

- The Atlantic Striped Bass Management Board must react quickly when threats to the stock arise; delayed action solves nothing, and only leads to larger problems;
- The striped bass stock must be rebuilt by 2029, as required by the fishery management plan;
- All participants in the striped bass fishery contribute to fishing mortality, and must shoulder a share of the conservation burden; neither recreational fishermen nor the catch-and-release fishery should be singled out for fishing mortality reductions that are not required of other participants; and
- The management plan should not allow anglers in any state or state to escape their full share of the conservation burden.

With those principles in mind, NYSCC requests that the Atlantic Striped Bass Management Board adopt the positions set forth below.

### MANAGEMENT TRIGGERS

#### *TIER 1 OPTIONS: Fishing Mortality (F) Management Triggers*

With respect to the fishing mortality triggers, NYSCC supports the following options:

- **Sub-option A1 (status quo):** Reduce F to a level that is at or below target within one year
- **Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A
- **Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must

be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A

The current fishing mortality targets have worked well.

In both Addendum IV and Addendum VI to Amendment 6 to the Interstate Fishery Management Plan, the Management Board successfully implemented 25% and 18% reductions in fishing mortality within one year. Having demonstrated its ability to promptly return fishing mortality to target, there is no reason to drag fishing mortality reductions out over two years. The sooner fishing mortality can be reduced to target, the sooner a depleted female spawning stock biomass can be rebuilt to its target.

With respect to the fishing mortality threshold trigger, overfishing poses a real and immediate threat to the striped bass stock. The more quickly the Management Board responds to such overfishing, the easier it will be to stop any decline in the population and restore the striped bass to health. NYSCC notes that sub-option B2's requirement for two years of data is deceiving, for depending upon when overfishing first occurs, and the time that passes between stock assessments, such sub-option could result in overfishing continuing for far more than just two years; if overfishing first appears in the terminal year of a stock assessment, sub-option B2 will allow it to continue for a minimum of three years, if assessments are updated every two years, and for even longer than that if there is a greater delay between updates. Overfishing should not go on for so long.

With respect to the fishing mortality target trigger, it makes sense to link rising fishing mortality with a declining spawning stock. To initiate management action if fishing mortality rises slightly above target for more than one year, if spawning stock management remains at or above target, is unnecessary.

#### *TIER 2 OPTIONS: Female Spawning Stock Biomass (SSB) Management Triggers*

With respect to the female spawning stock biomass triggers, NYSCC supports the following options:

- **Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment.
- **Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe not to exceed 10 years.
- **Sub-option C2:** If female SSB falls below the target for three consecutive years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe not to exceed 10 years.

NYSCC believes that the female spawning stock reference points are of critical importance.



For that reason, NYSCC considers the Management Board's failure to implement a 10-year rebuilding plan, as it was required to do when the spawning stock biomass target reference point was tripped by the 2013 benchmark stock assessment, to be inexcusable. NYSCC also believes that the Management Board's delay in initiating a rebuilding plan after the spawning stock biomass threshold trigger was tripped has created a situation in which the management measures included in the anticipated rebuilding plan, which under the terms of the current management plan must fully rebuild the stock by 2029, will of necessity be far more restrictive than they would have been had a plan be implemented by 2021. Sub-option A2 will prevent the Management Board from creating such situations again.

An overfished striped bass stock must be promptly addressed and remedied as soon as practicable. Sub-option B1 furthers such objectives. Completely eliminating the spawning stock biomass threshold trigger, out of the expectation that a tripped spawning stock biomass target trigger will prevent the threshold trigger from ever being tripped, would be a mistake, and could create issues should the Management Board again ignore the spawning stock biomass target trigger, as it did in 2014.

Sub-option C2 divorces the spawning stock biomass target trigger from the fishing mortality target trigger. Such divorce is desirable, for if the spawning stock biomass enters a period of continuing decline, such decline should be curtailed, even if fishing mortality does not rise above its target level.

### *TIER 3 OPTIONS: Recruitment triggers*

With respect to the recruitment triggers, NYSCC supports the following options:

- Sub-option A3: The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model (NY, NJ, MD, VA) shows an index value that is below the median of all values in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years. The high recruitment reference period used for this trigger may be adjusted as recommended by the TC during benchmark stock assessments. This trigger alternative has a higher sensitivity than both the status quo trigger and sub-option A2. This trigger alternative would have tripped six times since 2003: NY in 2006; MD in 2008; MD in 2009; MD and VA in 2010; NY in 2013; MD in 2014.
- Sub-option B2: If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

The current recruitment trigger is insufficiently sensitive, as it includes a long period of low recruitment that occurred after the striped bass stock collapsed in the late 1970s and 1980s. As a result, recent periods of very low recruitment, which included the lowest Maryland JAI recorded in more than 60 years, did not trigger management action. Sub-option A3 would create a more realistic management trigger that would require management action in response to the sort of low recruitment levels that contributed to the current depleted state of the striped bass stock.

Unfortunately, even if such more sensitive trigger was adopted, the current management plan would not require any management response. Such response would be required by sub-option B2; while sub-option B3 would also require management action, it would potentially allow years of delay before the Management Board had to act, and thus increase the risk to the striped bass.

*TIER 4 OPTIONS: Deferred Management Action*

With respect to deferred management action, NYSCC supports **Option A (status quo)**: No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

When threats to the stock arise, they should be addressed promptly, even if the Management Board had recently acted to address a different threat or threats. Allowing such threats to continue until the next assessment or assessment update only causes more harm to the striped bass stock and makes it more difficult to address the threats when action is finally taken.

#### **RECREATIONAL RELEASE MORTALITY**

With respect to the issue of recreational release mortality, NYSCC supports the following options:

- **Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in releasing of a striped bass. A non-lethal device means any tool used in the removal of striped bass from the water or to assist in the releasing of striped bass that does not pierce, puncture, or otherwise cause invasive damage to the fish that may result in its mortality. Some states already have regulations that ban the use of gaffs, but the language used in this option would encompass a broader suite of lethal devices, including gaffs.
- **Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury. The Board approved this language on incidental catch as guidance to Addendum VI in March 2021; this guidance could not be a compliance criterion as part of Addendum VI since incidental catch was not originally part of Addendum VI. Selecting this option would make this incidental catch provision a requirement under Amendment 7 for striped bass that are incidentally caught on any unapproved method of take, including non-circle hooks with bait attached (as implemented through Addendum VI).
- **Sub-option D2:** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports.

NYSCC believes that the use of gaffs or other lethal devices to land striped bass is unnecessary, particularly given the slot size limit; nets are fully adequate to land fish less than 35 inches long. Prohibiting gaffs removes the possibility that fish that fall outside the slot limit will be gaffed and returned to the water.

With respect to sub-option C2, New York already has a mandatory release requirement for striped bass caught on J-hooks used with bait. However, NYSCC still endorses the sub-option, as other states have not yet adopted similar requirements, and thus provide anglers with legal means to subvert the circle hook requirement.

With regard to education and outreach, while NYSCC supports such efforts, sub-option D2, which merely recommends, but does not require, education and outreach programs is the preferred approach. Sub-option D1, which would require education and outreach programs, would place an unreasonable burden on financially strapped state agencies, and would potentially conflict with such agencies' spending priorities.

NYSCC must also express its strong opposition to Option B.

Recreational release mortality should not be singled out for mortality reductions that are not also imposed on recreational landings, commercial landings, or commercial discard mortality. As the Atlantic States Marine Fisheries Commission (ASMFC) noted in its Public Information Document For Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass, "The source of mortality does not matter to the health of the stock, as long as the overall fishing mortality is below the threshold."

With respect to the no-targeting proposals, whether in the ocean or in the spawning areas, NYSCC refers to the advice provided by the ASMFC's Law Enforcement Committee, which stated that it would be difficult to enforce regulations that prohibited anglers from targeting striped bass.

## REBUILDING PLAN

### *Recruitment Assumption for Rebuilding Calculation*

With respect to the recruitment assumption for the rebuilding calculation, the NYSCC supports **Option B**: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis. Using the low recruitment assumption in Option B would likely result in a lower F rebuild than under Option A.

In recent years, striped bass recruitment has been below its historical levels. Assuming that such low recruitment will continue into the rebuilding period and imposing a lower fishing mortality rate during that period, makes it more likely that the rebuilding plan will succeed.

### *Rebuilding Plan Framework*

With respect to the rebuilding plan framework, NYSCC supports **Option B**: If the 2022 stock assessment indicates that Amendment 7 measures have less than a 50% probability of rebuilding the stock by 2029 (as calculated using the recruitment assumption specified in Amendment 7) and if the stock assessment indicates that 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.

The Management Board has little time left to rebuild the striped bass stock by the 2029 deadline, and recent low recruitment will make the task of rebuilding even more difficult. If the Management Board is able to implement needed management measures through its own action, the needed measures may be put in place by early 2023; if the Management Board is required to go through the status quo process for developing an addendum to the management plan, such measures won't go into effect until 2024. The extra year provided by Option B may be critical to the rebuilding plan's success.

### MANAGEMENT PROGRAM EQUIVALENCY

With respect to management program equivalency issues, NYS CC supports the following options:

- **Sub-option B1-a:** the stock is at or below the biomass threshold (i.e., overfished), CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.
- **Sub-option B1-c:** fishing mortality is at or above the fishing mortality threshold (i.e., overfishing is occurring), CE programs would not be considered until a subsequent stock assessment indicates fishing mortality is below the threshold level.
- **Sub-option C3:** CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30.
- **Sub-option D2:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.
- **Sub-option E2:** Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected to the FMP standard at the state-specific level.

Conservation equivalency proposals, based on relatively imprecise state-level catch and landings data, incorporate a significant level of management uncertainty. Because such uncertainty injects additional risk into the management process, conservation equivalency shouldn't be permitted when the stock is under serious threat, and either overfished or experiencing overfishing. Sub-options B1-a and B1-c address such contingencies.

As noted in the Draft Amendment, the National Marine Fisheries Service is about to issue guidance advising that the use of Marine Recreational Information Program estimates with a percent standard error greater than 30 is inappropriate for most fishery management purposes. That being the case, MRIP data with a PSE greater than 30 should be deemed insufficiently precise for use in conservation equivalency proposals. Option C3 would adopt the standard for Amendment 7.

Adopting such standard would still allow data with a percent standard error as high as 30; to prevent the use of such data from undercutting the effectiveness of conservation equivalent management measures, sub-option D2, which would impose a 25% uncertainty buffer, should be adopted as well.

In addition, because some states have chronically abused the conservation equivalency process, to the detriment of neighboring states and the striped bass stock, sub-option E2 should be adopted to prevent such abuse from recurring. It is important to note the comment in the Draft Amendment, to the effect that adoption of sub-option E1 could undercut the effectiveness of the striped bass management

program, and to note that such option E1, by allowing states to adopt lesser reductions in fishing mortality than would be achieved by the FMP standard measures, is contrary to language in the Interstate Fishery Management Program Charter stating that conservation equivalent measures must “achieve the same quantified level of conservation” as the FMP standard. NYSCC asks that the Management Board adopt the measures recommended above.

Sincerely,

A handwritten signature in cursive script that reads "A Charles Parker".

A Charles Parker  
President, New York State Conservation Council

From: [Raps](#)  
Sent: Sunday, March 27, 2022 2:26 PM  
To: [Comments](#)  
Cc: [Raps](#)  
Subject: [External] Draft Ammendment 7

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Hello,

I am a member and President of the North Brookhaven Sport Fisherman Club in Mt. Siani, NY. Our club has 50 active members. Rebuilding the stocks and keeping our fisheries healthy the utmost importance for us, our children and our grandchildren.

We agree with the New York Coalition for Recreational Fishing on adopting the following in Draft Amendment 7.

#### Tier 1-Fishing Mortality Management Triggers

- \* Option A1: the one-year status quo.
- \* Option B1: maintains the one-year status quo.
- \* Option C1: status quo option

#### Tier 2-Female SSB Management Triggers

- \* Option A2: 2-year deadline to implement a rebuilding plan
- \* Option B1: Status quo
- \* Option C1: Status quo

#### Tier 3-Recruitment Triggers

- \* Option A3: Below median of all values for three consecutive years
- \* Option B2: Reduce F to target in one year

#### Tier 4 Deferred Management Action

- \* Option A: No deferred action

#### 4.2.2 Recreational Release Mortality

- \* Option A: Status Quo (circle hook measures)
- \* Option B1: No – Effort Closures – State –Specific Two-Week Closures
- \* Option B2: No – Effort Closures – Spawning Area Closures
- \* Option C1: Yes – Additional Gear Restrictions – permit only non-lethal devices for removing fish
- \* Option C2: Yes - Additional Gear Restrictions –fish caught on any unapproved method must be returned to the water
- \* Option D1: Yes – Outreach and Education – States required to develop public education and outreach campaigns

#### 4.4.1 Rebuilding Plan

- \* Option B: Assumption for Rebuilding – Use low recruitment regime assumption (although an average of the standard recruitment method and the low recruitment regime seems more appropriate to me)

#### 4.4.2 Rebuilding Plan Framework

\* Option B: Permit Board to take action in response to 2022 benchmark assessment without having to go through an amendment or public comment period

#### 4.6.2 Management Program Equivalency

\* Sub-Option B1a: Restriction – stock is at or below the biomass threshold

\* Sub-Option B1c: Restriction – fishing mortality is at or above the fishing mortality threshold

\* Sub-Option B2b: Applicability: Quota managed recreational fisheries

\* Sub-Option C3: Precision Standards for MRIP Estimates – 30

Sub-Option D3: CE Uncertainty for non-quota managed fisheries – 50%

\* Sub-Option E2: Percent reduction at the state-specific level

Robert V. Rapisarda  
President NBSFC  
37 Avondale Dr.  
Centereach, NY

From: [Rich Strzepek](#)  
Sent: Wednesday, April 6, 2022 10:53 PM  
To: [Comments](#)  
Cc: [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
Subject: [External] Striped Bass Amendment 7 comments

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Categories: Auto Replied

To the ASMFC

On behalf of the 40 members of the North Fork Anglers Fishing Club located on the North Fork of Long Island, New York following are our consensus recommended choices for Amendment Seven effecting the management of striped bass.

4.1

Tier 1

Option A- Support A1

Option B- Support B1

Option C- Support C1

Tier 2

Option A- Support A2

Option B- Support B1

Option C- Support C1

Tier 3

Option A- Support A3

Option B- Support B2

Tier 4

Support A

4.2

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D1

4.4.1

Support B

4.4.2

Support B

4.6.2

Option B- Support B1-a

Option C- Support C3

Option D- Support D3

Option E- Support E2

We believe the guiding principle for all decisions for Tiers 1 through 4 striped bass management is to manage the fishery for abundance and not based on yield to end overfishing as quickly as possible. .

Thank you for considering our comments.

Richard E. Strzepek, Secretary of North Fork Anglers Fishing Club  
Mattituck, NY 11952





# PLUM ISLAND SURFCASTERS

*Established 1957*

Emilie Franke

Atlantic States Marine Fisheries Commission

1050 N. Highland Street, Suite 200 A-N

Arlington, VA 22201

Dear Emilie,

Please find the following comments representing the Plum Island Surfcaster (PISC), a 450 member North Shore Massachusetts fishing club, input on Amendment 7 for striped bass management. The PISC is a non-profit sportfishing club committed to developing best practices in good sportsmanship, education, techniques and conservation for future generations.

While our opinion is that the requirements in Amendment 6 should have been sufficient to prevent the downward trajectory of striped bass over the last 10-years, now reaching the point of being overfished. The Striped Bass Management Board's limited actions has put us in a position where a new amendment is now required. Our membership and many others in the fishing community we work with have lost faith and trust in the ASMFC willingness to do what is needed in managing a health striped bass stock. Based on this, the PISC input is focused on requiring the Board to act quickly when the science indicates the stocks are not within target values and limiting the Boards discretion to get around taking needed action in a timely manner.

4.1 Management triggers:

**Tier 1 Options:** Fishing Mortality (F) Management triggers

***Sub-option A1***

***Sub-option B1***

***Sub-option C1.***

**Tier 2 Options:** Female Spawning Stock Biomass (SSB) Management triggers

***Sub-options A2***

***Sub-option B1***

***Sub-option C1.***

**Tier 3 Options:** Recruitment Triggers

***Sub-option A3***

***Sub-option B2.***

## **Tier 4 Options: Deferred Management Actions**

### **Option A.**

#### 4.2.2 Measures to Address Recreational Release Mortality

##### **Option A.**

*One of the issues noted with required use of circle hooks it is hard to enforce since someone using J hooks could just say they are fishing for blue fish. A suggestion would be to require circle hooks for all species regulated by ASMFC, at least above a certain hook size.*

***Sub-option B1-a** but changing it to say **no harvesting** rather than targeting. This would be very difficult to enforce if targeting is used. Should get much of the expected results if harvesting is used. (page 60)*

##### **B2-a**

##### **Sub-option C1**

##### **Sub-option C2**

##### **Sub-option D1**

#### 4.3.2.1 Commercial Quota Transfers

***Recommend current practice of no transfer.***

#### 4.4.1 Recruitment Assumption for Rebuilding Calculation

##### **Option B**

#### 4.4.2 Rebuilding Plan Framework

##### **Option B**

#### 4.6.2 Management Program Equivalency

##### **Sub-option B1-a**

##### **Sub-option B1-c**

##### **Sub-option B2-a**

##### **Sub-option B2-b**

##### **Sub-option C3**

##### **Sub-option D3**

##### **Sub-option E2**

While not currently listed as an option for change on draft amendment 7. The Plum Island Surfcasters highly recommends that the following changes be made to the commercial tagging program to ensure all fish caught under commercial harvest regulations are counted towards the quota. Currently in Massachusetts tags are placed at time of sale which makes it easier for commercial caught fish not to be counted toward quota. Massachusetts laws allow for commercially caught fish to be kept for personal use, bartered or traded. The only way these would be counted is during the monthly report that depends on honesty. Currently only about 25% of licensed commercials report catching any fish.

#### 3.1.1 Commercial Tagging Program:

### Tag Timing

States or jurisdictions with a commercial striped bass fishery may choose to implement their commercial tagging program at either the point of harvest or the point of sale.

***Recommend that this be changed to require that tags shall be placed at point of harvest.***

### Tag Accounting

States and jurisdictions with a commercial striped bass fishery must require permit holders to turn in unused tags or provide an accounting report for any unused tags prior to the start of the next fishing season. Tags or the accounting report shall be turned into the agency issuing the tags. The accounting report must include the disposition of all tags issued to the permittee (e.g., used, unused, broken, lost). Permit holders who do not comply with this section may be subject to penalties as set forth below.

***Recommend that this be changed to require all unused tags be turned in or accounted for.***

Sincerely

Michael Toole

toolemf@hotmail.com

Legislation Representative

Plum Island Surfcasters

P.O. Box 1585

Newburyport, MA 01950



March 30, 2022

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

**RE: Draft Amendment 7 Comments**

Please accept the following comments on behalf of the Recreational Fishing Alliance (RFA) on draft Amendment 7 to the Atlantic Striped Bass Fishery Management Plan.

**4.1 Management Triggers**

**Tier 1 Fishing Mortality Management Triggers:** RFA supports Sub-option A2, Sub-option B2, and Sub-Option C2. RFA selected these options for several reasons. First, utilizing multiple years of fishing mortality estimates which are heavily driven by MRIP, helps increase the confidence in the fishing mortality determination. By its design, MRIP is more accurate over multiple years. Second, these options, by providing more time to design a management response, would increase the likelihood that the results of a stock assessment will become available and help better decisions. Finally, we believe there is value in utilizing a less reactive approach with the fishing mortality triggers. With the overwhelming source of mortality being attributed to released fish in the recreational sector and with discards carrying the higher percent error relative to harvest through MRIP, it clearly makes sense to utilize more years of data before taking action. The selected options are also cons.

**Tier 2 Female Spawning Stock Biomass Management Triggers:** For Option A, RFA supports Sub-option A1, status quo. Referring to the options supported in Tier 1, RFA believes that action taken under Tier 1, Sub-option A2 would produce an adequate management response necessary to initiate rebuilding.

For Option B, RFA supports Sub-option B1. With striped bass being a slow growth, long-lived species with female SSB that does not display significant annual variation, we believe that one year below the SSB threshold is a good indicator that action should be taken. RFA does have issues with the current biological reference points, including the SSB thresholds, and believes they are too high but we do not support addressing excessively high reference points through a management band aid. RFA hopes the reference points can be addressed through the 2025 benchmark stock assessment.

For Option C, RFA supports Sub-option C3. RFA believes management of fishing mortality should be the driving principle in striped bass management. This belief is based on the fact that much of the rebuilding success of striped bass is dependent upon environmental factors. Furthermore, we are not confident that variability around a biomass target should prompt an immediate management response.

**Tier 3 Recruitment Trigger Definition:** RFA supports Sub-option A1. Recruitment success has proven to be highly influenced by environmental factors with no clear stock recruitment relationship. RFA believes the current criteria for recruitment triggers is adequate. This is further confirmed in Table 2 which illustrates that options A2 and A3 would have exceeded recruitment triggers during years when the biomass was at very high levels of abundance. Taking action during those years would have not been appropriate and would have led to significant increases in regulatory discarding.

For Option B, RFA supports Sub-option B1 which would maintain the status quo approach for management response when a recruitment trigger is tripped

**Tier 4 Deferred Management Action:** RFA supports Option B which would allow management action to be deferred until the next assessment. We believe it is essential to allow adequate time for management actions to have their intended impact on fishing mortality before further action is taken. Fishing mortality can only be evaluated in an assessment update or benchmark assessment.

#### **4.2 Recreational Fishery Management Measures**

Mortality associated with releasing striped bass is now the largest source of mortality (54%) but RFA clearly acknowledges that release mortality does have value in this fishery. Mortality associated with discarding is the biggest fishing related issue impacting the stock and RFA finds it extremely disconcerting that Amendment 7 provides very little, if any, detailed information on the potential outcome of options presented to address the primary source of mortality in this fishery. Noting that release mortality is the primary source of mortality in the striped bass fishery, RFA is opposed to measures that would negatively impact recreational harvest.

RFA is frustrated that the measures currently in place that were implemented through Addendum VI to reduce recreational discard mortality through the use of circle hooks when fishing with bait have not been quantified. While we understand intuitively that the use of circle hooks should provide benefit to the stock, it is unfortunate that the performance of this management action cannot be determined. Therefore, 9% is still the standard used for recreational caught striped bass that are released and are assumed to die when thrown back. This is an average value that can swing widely based on the gear type, length of fight, air/water temps, handling, injury etc. Yet, this document does not give us the information to make informed decisions to address these various known factors that impact realized release mortality values in the recreational striped bass fishery.

In a similar fashion, RFA is dismayed that Amendment 7 does not include any information on the reduction to release mortality or overall fishing mortality that may be achieved through a seasonal or spawning area closure. Considering the potential disruption and socioeconomic impact that a prohibition on targeting striped bass may have, RFA cannot support a closure until those impacts and benefits can be quantified. Likewise, RFA also believes it is necessary to be able to

determine the effectiveness of a closure, if implemented, so the public can determine if its use is having the desired effect.

RFA finds it unfortunate that the Amendment 7 does not include data on the composition or the cause of recreationally released striped bass. It is critical to understand what drives anglers to discard a striped bass. Was it a regulatory response or was it a voluntary action? Knowing this information is essential for the public to determine if the resented options make sense and address the real issues. Therefore, RFA is not in a position to support any options in this section to address release mortality beyond those measures adopted by Addendum VI. RFA does support greater outreach and educational efforts to inform anglers on how to reduce their own release mortality rate such as better handling practices and perhaps self-regulating catch and release knowing that for every 12 fish released, 1 was killed on paper. RFA believes this outreach is best achieved in partnership with and through the industry, particularly the fishing media outlets.

RFA does think it is important to note that the Amendment 7 is clear that reductions to harvest will have limited success in reducing fishing mortality. Harvest is not the problem at this time and cuts to recreational harvest stand to have little if any management benefit. Given the lack of information and inability to measure performance, RFA cannot support any further options to reduce discard mortality at this time. Therefore, RFA supports Option A.

#### **4.4 Rebuilding Plan**

RFA is very concerned about the ability to rebuild striped bass biomass to the SSB target by 2029. It's important to recognize two key points. First, in the history of this fishery, female SSB has never reached the rebuilding target, even in 2003 when the stock reached the highest biomass value in recorded history. This inability to meet the current rebuilding target clearly demonstrates that the biological reference points including the rebuilding target are not realistic. Second, in recent years, the striped bass population has been less productive than it was when the rebuilding targets were established. Meaning, fishing mortality is having less direct impact on rebuilding progress observed in the stock. It seems highly unlikely that the stock will be rebuilt by 2029. But since the ASMFC does not control environmental factors and still uses a fixed natural mortality value, the only recourse they can take when rebuilding lags is drastic cuts to fishing regulations. Perhaps a question that needs to be asked in Amendment 7 is if we can't rebuild by 2029 without imposing massive restrictions on the fishing community, should we be happy with the current status of the stock and just try to manage F. RFA has a hard time supporting any of the rebuilding options in the document because we feel that we are being set up for failure with this fishery. We believe it is imperative that the biological reference points are revisited in the next benchmark assessment 2025 before selecting a management response.

#### **4.6 Management Program Equivalency**

RFA supports Option A which would allow the continued use of conservation equivalency. Amendment 7 provides no real data that demonstrates that a CE performs any differently than coastwide measures, therefore, we find it impossible for the public to make an informed decision on this important management tool. Amendment 7 talks about a 'concern' about the performance of CE measures that states have utilized over the years. However, if there has not been an analysis

performed to determine if CE works better or worse than coastwide measures, the concern is only 'perceived' in nature, not an actual concern. CE has proven to be the very tool that gives the states the flexibility to craft their own measures based on the input and needs of their fishermen. RFA generally views the option of giving states the ability to draft and implement preferred management measures specific to their needs over centralized mandates.

RFA sees no need to apply specific criteria to CE use as by its very definition, is equivalent and therefore makes no difference if it's used when the stock is high or low. It is important to remember that CE proposals go through Technical Committee review prior to approval.

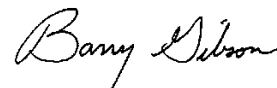
From the perspective of recreational release mortality, denying the use of CE would absolutely increase the number of discarded striped bass in most states. Amendment 7 is very clear in identifying the largest source of mortality in this fishery is recreational release mortality. By withdrawing the use of CE would only add to the greatest source of mortality.

Thank you for the opportunity to provide comments and for considering RFA's input on this important issue.

Sincerely,



John DePersenaire  
Executive Director



Capt. Barry Gibson  
NE Regional Director



R.I. Party and Charter Boat Association  
P.O. Box 171  
Wakefield, RI 02880  
401-741-5648  
[www.rifishing.com](http://www.rifishing.com)



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Vice President  
Treasurer  
Secretary  
Director

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Capt. Steve Anderson  
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Capt. Paul Johnson  
Capt. Nick Butziger

March 18, 2021

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

RE: Striped Bass AMD 7

Dear Ms. Franke,

On behalf of 54 members of the R.I. Party and Charter Boat Association and nearly 100 crew, I would like to submit the following comments regarding the ASMFC's Amendment 7 to the Atlantic Striped Bass FMP. The most important species to Rhode Island's charter fishing industry and thousands who fish aboard our vessels is unquestionably Striped Bass. The actions under consideration in Amendment 7 have the potential to significantly impact our businesses and the experiences of our clients. We appreciate the opportunity to offer our thoughts from the perspective of the small business owner that relies on Striped Bass to operate.

Goal and Objectives:

We believe the goal of AMD 7 is appropriate and meets the needs of our modern-day fishery. In addition to many of the current objectives that seek to achieve the FMP goal, we feel a strong message needs to be included in the objectives that recognizes a need to preserve the historic value of Striped Bass as a food fish. According to recreational catch data, a significant portion of the current Striped Bass fishery is a recreational catch and release type fishery. Recent rebuilding efforts, age structure of the stock, and social changes has shifted the historic food fishery towards a catch and release fishery, but we feel the folks who wish to fish for striped bass for a meal and those folks who wish to purchase striped bass at a market should not be forgotten. We support management that increases the level of harvested Striped Bass and reducing the level of discarded Striped Bass from current levels.

Objective #7 "Establish a fishing mortality target that will result in a net increase in the abundance (pounds) of age 15 and older striped bass in the population, relative to the 2000 estimate" is redundant and addressed within the first two objectives. We continue to recommend removing this objective.

Under the current FMP, mainly mortality associated with harvest is managed. Recreational release mortality is the most significant contributor to overall mortality, yet that mortality goes mostly unchecked by management. We do not think it is reasonable to put the burden of rebuilding squarely on the backs of the fishing community who wish to harvest and eat a Striped Bass, while ignoring a major driver of mortality.



Significant, mandatory outreach to the recreational fishing community that raises the awareness of release mortality should be implemented as soon as possible.

The Striped Bass are part of a higher trophic level, with an important position in the ecosystem. We continue to oppose managing this species for abundance, at the request of and benefit to a portion of the recreational fishery. Biologically, this approach ignores the impacts abundance would have on the ecosystem and artificially influences nature. We strongly suggest analyzing the impacts that managing for abundance would have on other important commercial and recreational fisheries well before considering this an objective as suggested by some. Socially, managing for abundance has the potential to remove the challenge that builds the thrill which draws many to the Striped Bass fishery. The magic of the Striped Bass fishery is not found in catching one on very cast, but instead the learning, pursuit, and hard work that goes into success.

The RIPCBA support's increasing recreational accountability. The for-hire sector of the recreational fishery should have its own RHL and measures. The for-hire sector should be held accountable to that RHL. Tools currently in place for much of the for-hire fishery, such as eVTR's, could be put in place for the entire for-hire fishery for monitoring the RHL. Separating the private and for-hire sector RHL's would allow for separate measures specific to the needs of each sector and create a management system with less conflict between users during spec setting processes and allow the smaller for-hire sector to craft management measures aimed at rebuilding the sector which has been hurt by previous management measures.

All stakeholders who enjoy Striped Bass need to be respected when considering this FMP's Goals and Objectives. A balanced FMP, one that recognizes the diversity of communities that value Striped Bass for a variety of reasons, should be a guiding theme for the future of Striped Bass management. RI's for hire fleet benefits from management stability and regulatory consistency, but there is a continued need for some level of flexibility to allow for regional and recreational mode specific needs.

### **Management Triggers:**

#### ***TIER 1 OPTIONS:*** Fishing Mortality (F) Management Triggers

Option A: Timeline to Reduce F to the Target

We support Sub-option A2: Reduce F to a level that is at or below the target within two years.

Option B: F Threshold Triggers

We support Sub-option B2: If the two-year average F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A. The two-year average F should not include data under different management actions (i.e., the F threshold trigger should not be evaluated unless there are at least two years of data in the assessment under the most recent management action).

Option C: F Target Triggers

We Support Sub-option C2: If F exceeds the F target for three consecutive years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

#### ***TIER 2 OPTIONS:*** Female Spawning Stock Biomass (SSB) Management Triggers

Option A: Deadline to Implement a Rebuilding Plan

We support Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment.

Option B: SSB Threshold Trigger

Sub-option B1 (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

Option C: SSB Target Trigger

We support Sub-option C2: If female SSB falls below the target for three consecutive years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

***TIER 3 OPTIONS:*** Recruitment Triggers

Option A: Recruitment Trigger Definition

We support Sub-option A1 (status quo): The recruitment trigger is tripped when any of the JAIs (ME, NY, NJ, MD, VA, NC) show recruitment failure, which is defined as a value that is below 75% of all values (i.e., below the 25th percentile) in a fixed time series appropriate to each juvenile abundance index, for three consecutive years. This status quo trigger tripped one time (NC in 2020) since approval of Amendment 6 in 2003 (Table 2). The state JAIs and reference periods are as follows:

Option B: Management Response to Recruitment Trigger

We support Sub-option B1 (status quo): If the recruitment trigger is tripped, the Board would review the cause of recruitment failure (e.g., fishing mortality, environmental conditions, and disease) and determine the appropriate management action.

***TIER 4 OPTIONS:*** Deferred Management Action

We support Option B: Management action may be deferred until the next assessment if it has been less than three years since the last management action was implemented in response to a management trigger.

And/or

We support Option C: Management action may be deferred until the next assessment if the F target management trigger is tripped and SSB is above the target.

And/or

We support Option F: If a management trigger trips after the Board has already initiated action in response to a different management trigger, the Board can defer management action in response to the subsequent trigger until the next assessment.

4.2.2 Measures to Address Recreational Release Mortality

We Support Option D. Outreach and Education

We support Sub-option D1: States would be required to promote best striped bass handling and release practices by developing public education and outreach campaigns. States must provide updates

on public education and outreach efforts in annual state compliance reports. Best practices could include:

- **Once an angler has retained their bag limit, consider targeting a different species. (Most important).**
- If the hook is swallowed, do not forcefully remove it. Cut the line off as close to the mouth as possible and then release the fish.
- Don't use the gills or eyes as a handhold. On larger fish, support under the belly.
- Reduce the fight time.

#### **4.4 REBUILDING PLAN**

4.4.1 Recruitment Assumption for Rebuilding Calculation: We support Option A (Status Quo): Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the standard recruitment method from the stock assessment.

4.4.2 Rebuilding Plan Framework: We support Option A (Status Quo): If the 2022 stock assessment results indicate the Amendment 7 measures are not projected to achieve stock rebuilding by 2029 (as calculated using the recruitment assumption specified in Amendment 7), the Board would initiate and develop an addendum to consider adjusting management measures to achieve F rebuild.

#### **4.6 ALTERNATIVE STATE MANAGEMENT REGIMES**

4.6.2 Management Program Equivalency: We support Option A (Status Quo): Board Discretion on Conservation Equivalency Restrictions and Requirements

#### **4.10 RECOMMENDATION TO THE SECRETARY OF COMMERCE FOR COMPLEMENTARY MEASURES IN FEDERAL WATERS**

We support the ASMFC Striped Bass Board recommend to the Secretary of Commerce, opening of the Block Island Transit Area for fishing for Striped Bass when rebuilding is complete.

**5.0 COMPLIANCE:** We support enforcement of all Striped Bass management measures. The rampant poaching, well documented each season, is concerning to us and it should be concerning to everyone interested in the best management of Striped Bass. States should be incentivized to hold poachers more accountable.

Respectfully Submitted,

Capt. Rick Bellavance

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

From: [Greg F Vespe](#)  
Sent: Friday, April 15, 2022 10:49 AM  
To: [Comments](#)  
Subject: [External] RISAA Comments on Amendment 7

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Categories: Auto Replied

Dear Ms. Franke & Striped Bass Management Board:

The Rhode Island Saltwater Anglers Association (RISAA) is pleased to have the opportunity to comment on the draft Amendment 7 regarding management of Atlantic Striped Bass. We signed on to the Group Letter organized by American Saltwater Guides Association and agree with all of the recommendations in that letter to ensure that Striped Bass populations are brought back to strong levels. In addition we wanted to state that, under section 4.2.2 Option B we are in favor of Spawning Area Closures. RISAA supports Option B2-b. All recreational targeting of striped bass would be prohibited for a minimum two-week period on all spawning grounds. We feel that the poor recruitment over the last 3 years requires greater protection during spawning. We would not be opposed to re-evaluation of this requirement after 3 years, especially if recruitment is improved. Thank you for the opportunity to comment on this important management issue.

Sincerely,  
Greg Vespe  
Executive Director  
Rhode Island Saltwater Anglers Association



**THE BAY CENTER**  
100 Save The Bay Drive  
Providence, RI, 02905  
phone: 401-272-3540

**EXPLORATION CENTER**  
Easton's Beach Rotunda  
175 Memorial Blvd.  
Newport, RI, 02840  
phone: 401-324-6020

**SOUTH COUNTY CENTER**  
Riverside Building  
8 Broad Street  
Westerly, RI, 02891  
phone: 401-315-2709

via email to: [comments@asmfc.org](mailto:comments@asmfc.org)

April 12, 2022

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

**Re: Atlantic Striped Bass Draft Amendment 7**

Dear Ms. Franke,

Thank you for the opportunity to comment on Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass. Save The Bay supports management measures that are protective of existing striped bass populations and are likely to encourage rebuilding and stock stability. Below, please find the specific management options that our organization supports:

**4.1 Management Triggers**

Tier 1: Fishing Mortality (F) Triggers

Option A: Timeline to Reduce F to the Target  
Save The Bay supports **Sub-option A1** (status quo)

Option B: F Threshold Triggers  
Save The Bay supports **Sub-option B1** (status quo)

Option C: F Target Triggers  
Save The Bay supports **Sub-option C1** (status quo)

Tier 2: Spawning Stock Biomass (SSB) Triggers

Option A: Deadline to Implement a Rebuilding Plan  
Save The Bay supports **Sub-option A2**: Two-Year Deadline to Implement a Rebuilding Plan

Option B: SSB Threshold Trigger  
Save The Bay supports **Sub-option B1** (status quo)

Option C: SSB Target Trigger  
Save The Bay supports **Sub-option C1** (status quo)

Tier 3: Recruitment Triggers

Option A: Recruitment Trigger Definition  
Save The Bay supports **Sub-option A2**: The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)11 shows an index value that is below 75% of all values

(i.e., below the 25th percentile) in the respective JAI from 1992- 2006, which represents a period of high recruitment, for three consecutive years.

#### Option B: Management Response to Recruitment Trigger

Save The Bay supports **Sub-option B2**: If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

#### Tier 4: Deferred Management Action

Save The Bay supports **Option A** (status quo)

### **4.2.2 Measures to Address Recreational Release Mortality**

#### Option B. Effort Controls (Seasonal Closures)

Save The Bay **does not support** seasonal closures in Amendment 7.

#### Option C. Additional Gear Restrictions

Save The Bay supports **Sub-option C1**: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

Save The Bay supports **Sub-option C2**: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

#### Option D. Outreach and Education

Save The Bay supports **Sub-option D2**: It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns.

## **4.4 Rebuilding Plan**

### 4.4.1 Recruitment Assumption for Rebuilding Calculation

Save The Bay supports **Option B**: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

### 4.4.2 Rebuilding Plan Framework

Save The Bay supports **Option B**: 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 recruitment assumption specified in Amendment 7) 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.

### 4.6.2 Management Program Equivalency

Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status

Save The Bay supports **Sub-option B1-a**: CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals

Save The Bay supports **Sub-option C3**: CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30.

Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries

Save The Bay supports **Sub-option D2**: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%. *Save The Bay is not opposed to Sub-option D1 if all other preferred rebuilding measures are adopted.*

Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries

Save The Bay supports **Sub-option E2**: Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Thank you for considering Save The Bay's comments and preferred alternatives. We appreciate the hard work of the Commissioners, FMP staff, and all those who have helped craft these critically-important management measures.

Sincerely,



Michael Jarbeau  
Narragansett Baykeeper, Save The Bay

From: [Guy, Marc](#)  
Sent: Friday, April 15, 2022 1:47 PM  
To: [Comments](#)  
Cc: [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
Subject: [External] Comments on Amendment 7 - South Shore Fly Casters

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Categories: Auto Replied

To the Advisors and Board members of the Atlantic States Marine Fisheries Commission: South Shore Fly Casters, a 501c non-profit representing over 300 members, was created with the goal of making the sport of saltwater fly fishing more accessible to the public. A critical part of our mission is to conserve our local fisheries so that our members and the broader community of recreational anglers can enjoy the sport for generations to come. We consider ourselves an important stakeholder in consideration of the future of striped bass stocks and we welcome the opportunity for public commentary on the proposed Amendment 7 to the ASMFC Atlantic Striped Bass Management Plan. With this said, we wish to support the following options in the current Amendment 7 draft:

On 4.1 Management Triggers, we support:

- Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality
- Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold
- Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions
- Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, we support:

- Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method
- Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, we support:

- Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. We recognize this option may require more restrictive management measures than option A, which we support

On 4.4.2 Rebuilding Plan Framework, we support:

- Option B to allow the Board to take direct management actions as well as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, "Management program equivalency (also known as "conservation equivalency" or CE) refers to actions



taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

We believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically, we support:

- Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level
- Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates
- Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries
- Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

Thank you for providing the opportunity to comment on Amendment 7. We look forward to learning the outcome of the upcoming stock assessment and to reading the final version of the Amendment.

Regards,

Marc Guy  
President & Co-Founder  
South Shore Fly Casters, Inc.



39 Industrial Park Road, Unit C  
Plymouth, MA 02360  
[www.stellwagenbank.org](http://www.stellwagenbank.org)

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April 14, 2022

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

**RE: Draft Amendment 7 Comments**

Dear Ms. Franke:

On behalf of the Stellwagen Bank Charter Boat Association (SBCBA) whose membership includes the for hire fleet, recreational anglers, and commercial fisherman, please accept the following comments on draft Amendment 7 to the Atlantic Striped Bass Fishery Management Plan.

**4.1 Management Triggers**

**Tier 1 Fishing Mortality Management Triggers:**

**Sub-option A2, Sub-option B2, and Sub-Option C2.** A multiyear fishing mortality is recommended because of the reliance on MRIP data that helps increase the confidence in the fishing mortality determination that is more accurate over multiple years. These options provide more time to design a management response, that increases the likelihood that the results of a stock assessment will become available and help make better decisions. There is value in utilizing a less reactive approach with the fishing mortality triggers. With the overwhelming source of mortality being attributed to released fish in the recreational sector and with discards carrying the higher percent error relative to harvest through MRIP, it makes sense to utilize more years of data before taking action.

**Tier 2 Female Spawning Stock Biomass Management Triggers:**

**Sub-option A1, status quo.** Use of Tier 1, Sub-option A2 would produce an adequate management response necessary to initiate rebuilding.

**Option B, Sub-option B1.** The use of a one year threshold below the SSB threshold is a good indicator if action should be taken because of striped bass being a slow growth, long-lived species with female SSB that does not display significant annual variation. The current biological reference points, including the SSB thresholds, in our opinion is too high and we do



39 Industrial Park Road, Unit C  
Plymouth, MA 02360  
[www.stellwagenbank.org](http://www.stellwagenbank.org)

not support addressing excessively high reference points through a management band aid and hope that reference points can be addressed through the 2025 benchmark stock assessment.

**Option C, Sub-option C3.** The management of fishing mortality should be the driving principle in striped bass management that that is primarily based on the fact that much of the rebuilding success of striped bass is dependent upon environmental factors. We are not confident that variability around a biomass target should prompt an immediate management response.

**Tier 3 Recruitment Trigger Definition: Sub-option A1.** Recruitment success has proven to be highly influenced by environmental factors with no clear stock recruitment relationship as a result the current criteria for recruitment triggers is adequate. This is confirmed in Table 2 which illustrates that Options A2 and A3 would have exceeded recruitment triggers during years when the biomass was at very high level of abundance. Taking action during those years would have not been appropriate and would have led to significant increases in regulatory discarding.

**Option B, Sub-option B1** would maintain the status quo approach for management response when a recruitment trigger is tripped.

**Tier 4 Deferred Management Action:** Option B would allow management action to be deferred until the next assessment. It is essential to allow adequate time for management actions to have their intended impact on fishing mortality before further action is taken. Fishing mortality can only be evaluated in an assessment update or benchmark assessment.

#### **4.2 Recreational Fishery Management Measures**

Mortality associated with releasing striped bass is the largest source of mortality (54%). Mortality associated with discarding is the biggest fishing related issue impacting the stock. Amendment 7 provides very little, if any, detailed information on the potential outcome of options presented to address the primary source of mortality in this fishery. Noting that release mortality is the primary source of mortality in the striped bass fishery, we oppose measures that would negatively impact recreational harvest.



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Measures currently in place and implemented through Addendum VI to reduce recreational discard mortality using circle hooks when fishing with bait have not been quantified. The use of circle hooks should provide benefit to the stock, it is unfortunate that the performance of this management action cannot be determined. Therefore, 9% is still the standard used for recreational caught striped bass that are released and are assumed to die when thrown back. This is an average value that can swing widely based on the gear type, length of fight, air/water temps, handling, injury etc. Draft Amendment 7 does not provide details to make informed decisions to address these various known factors that impact release mortality values in the recreational striped bass fishery.

Amendment 7 does not include information on the reduction to release mortality or overall fishing mortality that may be achieved through a seasonal or spawning area closure. No details have been provided on the potential disruption and socioeconomic impact of such closures. As a result, we cannot support a closure until those impacts and benefits can be quantified. It is also necessary to be able to determine the effectiveness of a closure, if implemented, so the public can determine if its use is having the desired effect.

Amendment 7 does not include data on the composition or the cause of recreationally released striped bass. It is critical to understand what drives anglers to discard a striped bass, is it a result of a regulatory response or was it a voluntary action? Knowing this information is essential for the public to determine if the presented options make sense and address the real issues. Therefore, SBCBA is not able to support any options in this section to address release mortality beyond those measures adopted by Addendum VI.

We support greater outreach and educational efforts to inform anglers on how to reduce their own release mortality rate such as better handling practices and perhaps self-regulating catch and release knowing that for every 12 fish released, 1 was killed on paper. The SBCBA believes this outreach is best achieved in partnership with and through the industry, particularly the fishing media outlets.

Based on review of Amendment 7 is clear that reductions to harvest will have limited success in reducing fishing mortality. Harvest is not the problem at this time and cuts to recreational harvest stand to have little if



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Plymouth, MA 02360  
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any management benefit. Given the lack of information and inability to measure performance, we cannot support any further options to reduce discard mortality at this time and therefore, support **Option A**.

#### **4.4 Rebuilding Plan**

We are very concerned about the ability to rebuild striped bass biomass to the SSB target by 2029 as detailed below.

In the history of this fishery, female SSB has never reached the rebuilding target, even in 2003 when the stock reached the highest biomass value in recorded history. This inability to meet the current rebuilding target clearly demonstrates that the biological reference points including the rebuilding target are not realistic.

In recent years, the striped bass population has been less productive than it was when the rebuilding targets were established. As a result, fishing mortality is having less direct impact on rebuilding progress observed in the stock.

The ASMFC does not control environmental factors and still uses a fixed natural mortality value. To continue such could result in drastic cuts to fishing regulations. We believe it is imperative that the biological reference points are revisited in the next benchmark assessment in 2025, before selecting a management response.

#### **4.5 Management Program Equivalency**

**Option A** allows the continued use of conservation equivalency. Amendment 7 provides no real data that demonstrates that a CE performs any differently than coastwide measures, therefore, we find it difficult for the public to make an informed decision on this important management tool. Amendment 7 talks about a ‘concern’ about the performance of CE measures that states have utilized over the years. However, if there has not been an analysis performed to determine if CE works better or worse than coastwide measures, the concern is only ‘perceived’ in nature, not an actual concern. CE has proven to be the very tool that gives the states the flexibility to craft their own measures based on the input and needs of their fishermen. The SBCBA generally views the option of giving states the ability to draft and implement

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Plymouth, MA 02360  
[www.stellwagenbank.org](http://www.stellwagenbank.org)

preferred management measures specific to their needs over centralized mandates.

SBCBA sees no need to apply specific criteria to CE use as by its very definition, is equivalent and therefore makes no difference if it's used when the stock is high or low. It is important to remember that CE proposals go through Technical Committee review prior to approval.

From the perspective of recreational release mortality, denying the use of CE would increase the number of discarded striped bass in most states. Amendment 7 is very clear in identifying the largest source of mortality in this fishery is recreational release mortality. By withdrawing the use of CE would only add to the greatest source of mortality.

If you have any questions or comments, please email, or give us a call.

Very truly yours,

*Capt Mike Pierdinock*  
Capt. Mike Pierdinock  
SBCBA, President  
[sbcbamp@gmail.com](mailto:sbcbamp@gmail.com)

*Capt Tim Brady*  
Capt. Tim Brady  
SBCBA, Vice President  
[tcbship874@gmail.com](mailto:tcbship874@gmail.com)

*Capt Rick Golden*  
Capt Rick Golden  
SBCBA, Secretary  
[1620anglers@gmail.com](mailto:1620anglers@gmail.com)

Cc: Michael Pentony, GARFO  
Russell Dunn, NMFS  
Ron Amidon, MassF&G  
Dan McKiernan, MassDMF



## DRAFT AMENDMENT 7

Stripers Forever  
209 Winn Road  
Falmouth, ME 04105  
[stripers@stripersforever.org](mailto:stripers@stripersforever.org)

April 15, 2022

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

Ms. Franke and the ASMFC Atlantic Striped Bass Management Board,

On behalf of Stripers Forever and our members along the Atlantic seaboard, across the U.S., and around the world, we submit our comments in support of those options we feel are the best of those made available for finalizing Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass. We thank you for the opportunity to do so.

Although we continue to be disappointed in the ASMFC's lack of urgency toward meeting its mandate with regard to managing this species, we will continue to do what we can to educate our members and the general public about fisheries conservation, safe handling of Striped Bass, and to raise awareness of each individual angler's responsibility for the recovery of wild Atlantic Striped Bass.

In the early stages of the development of draft Amendment 7, Stripers Forever members were unified in our position that a **ten-year equitable (recreational & commercial) harvest moratorium** was needed. Many agreed with us, including other conservation groups and like-minded individuals, and they joined us in speaking out. While this option was not included in draft Amendment 7 as it currently stands, we hope that the board will reconsider this option upon review of the forthcoming stock assessment results. A harvest moratorium is the only successful measure proven to fully recover the stock.



## 4.1 Management Triggers

### TIER 1 OPTIONS: Fishing Mortality (F) Triggers

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–Option A: Timeline to Reduce F to the Target– SF supports [Sub-option A1 \(status quo\): Reduce F to a level that is at or below the target within one year](#).

**Reasoning:** We believe that wherever possible the board should move as quickly as possible to reduce fishing mortality. Sub-option A1 offers the shortest timeframe to get it back below the target.

–Option B: F Threshold Triggers– SF supports [Sub-option B1 \(status quo\): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.](#)

**Reasoning:** Best of the two sub-options, action will not be taken under B2 unless a two-year average of F exceeds the F threshold.

–Option C: F Target Triggers– SF supports [Sub-option C1 \(status quo\): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.](#)

**Reasoning:** Best of the three sub options regarding an action trigger in the least amount of time. C2 requires 3 years of F exceeding F target and C3 has no trigger related to F target.

### TIER 2 OPTIONS: Female Spawning Stock Biomass (SSB) Management Triggers

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–Option A: Deadline to Implement a Rebuilding Plan– SF supports [Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment.](#)

**Reasoning:** This option puts in place a two-year deadline to implement a rebuilding plan. A1 (status quo) does not put in place a deadline to implement a rebuilding plan.

–Option B: SSB Threshold Trigger– SF supports [Sub-option B1 \(status quo\): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe \[not to exceed 10-years\].](#)

**Reasoning:** B2 offers no trigger related to the female SSB threshold. We believe that while an F trigger would likely be in place it is also important to keep an eye on and take corrective measures if the female SSB is in trouble.

–Option C: SSB Target Trigger– SF supports [Sub-option C1 \(status quo\): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe \[not to exceed 10-years\].](#)



**Reasoning:** Again, C1 offers the shortest time frame to rebuilding if the female SSB falls below the target. C2 requires 3 consecutive years and C3 contains no management trigger related to the female SSB target.

### TIER 3 OPTIONS: Recruitment Triggers

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-Option A: Recruitment Trigger Definition- SF supports Sub-option A3: The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model (NY, NJ, MD, VA) shows an index value that is below the median of all values in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years. The high recruitment reference period used for this trigger may be adjusted as recommended by the TC during benchmark stock assessments. This trigger alternative has a higher sensitivity than both the status quo trigger and sub-option A2 (Figure 1). This trigger alternative would have tripped six times since 2003: NY in 2006; MD in 2008; MD in 2009; MD and VA in 2010; NY in 2013; MD in 2014 (Table 2).

**Reasoning:** The status quo (current trigger) has only been tripped once in the period between 2003-2020, clearly it is not sensitive enough based on where the stock is currently at. A2 would have tripped the trigger 3 times in that same time period. A3, while classified as a “high sensitivity trigger”, would have tripped the trigger 6 times in that same time frame. As with the other options supported, we believe the board needs to operate with more caution moving forward, being aware of and addressing years of low recruitment ASAP.

-Option B: Management Response to Recruitment Trigger- SF supports Sub-option B2. If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

**Reasoning:** In the past, the board has failed to adjust F to account for both good and bad year classes (recruitment). With several recent years of poor year classes, we need the board to be more responsive to these shifts. B2 puts an interim F target adjustment in place if the recruitment trigger is tripped.

### TIER 4 OPTIONS: Deferred Management Action

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-SF supports Option A (status quo): No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

**Reasoning:** We cannot support any options which allow the board to defer action if a management trigger is tripped. Options B-F all allow for deferred action by the board in the event of a management trigger. Given where the stock is currently at, overfished with overfishing occurring, the “Board’s concern about the frequent need for management action due to triggers tripping with each stock assessment update or benchmark” is quite frankly, absurd. Stock assessments are typically conducted every 2 years and benchmark assessments every 5 years. If the board needs to convene and act more frequently to maintain a healthy stock, then so be it.

## 4.2 Recreational Fishery Management Measures

### Option B. Effort Controls (Seasonal Closures)

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-SF supports Sub-option B2. Spawning Area Closures: The Board can select either or both of the following sub-options B2-a and B2-b. Multiple states currently have spawning closures in place with closure boundaries defined by those states. Existing spawning closures would be applied toward meeting the requirements of the selected option(s).<sup>15</sup> Spawning area closures during the spawning season could contribute to stock rebuilding by eliminating harvest and/or reducing releases of spawning and pre-spawn fish. Reducing releases during this time is particularly important to reduce stress and injury to fish as they move into lower salinity spawning areas. If new information on the timing of striped bass spawning is available in the future, the TC would conduct a review of that research and recommend changes to the timing of spawning closures if needed. If this option is selected, CE would not be permitted.

-SF supports Sub-option B2-b. No-Targeting Spawning Closure Required: All recreational targeting of striped bass would be prohibited for a minimum two-week period on all spawning grounds (not necessarily the entire spawning area) during Wave 2 (March-April) or Wave 3 (May-June), as determined by states to align with peak spawning. States will determine the boundaries of spawning ground closures. Closures prohibiting recreational targeting on spawning grounds have already been implemented in Maine (Kennebec River), New Jersey (Delaware River), and Maryland (Chesapeake Bay) during part of Wave 2 and/or Wave 3 (Figure 4).

**Reasoning:** This is an important section of draft Amendment 7 and we believe it is vital to the recovery of the SSB and stock as a whole. Sub-option b2-a would prohibit harvest but allow for catch and release, b2-b would be a no targeting closure and would provide the best protection for the SSB while they spawn. The option is somewhat open ended with the language calling for a “minimum two-week period,” we would like to see it closer to a four- or six-week period to see the best results and gain the most protection for the SSB. Many other species benefit from shortened seasons or spawning closures and Striped Bass should as well. Considering the stock is currently overfished with overfishing occurring, the least we can do is allow for uninterrupted spawning. The argument that Striped Bass would be a bycatch while fishing for Bluefish or other species is mostly null as Bluefish do not show up in great numbers until after this timeframe. The uncertainty regarding these options surrounding the definition of the spawning areas and the possibility that states may need to work together to provide the most amount of protection for the SSB as they stage ahead of the spawn and then move up into the river to do so. The best example of this is the case of the Hudson River where fish stage in Raritan Bay, New Jersey before ascending the Hudson River to spawn in NY. In a best-case scenario this targeting closure would not only protect the spawning grounds but also the areas in which the SSB congregates prior to spawning, they go hand in hand. Despite these uncertainties we support these options with the hope that the TC and board will work together to develop these areas. Overall, these options err on the side of caution but with the Striped Bass SSB and stock being in such a dire situation, we believe any gain, no matter how big is worth the risk involved.

### Option C. Additional Gear Restrictions

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-SF supports Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

-SF supports [Sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.](#)

**Reasoning:** Stop the use of gaffs for removing fish from the water. Slot limits require more catch and release angling and we should do everything possible to provide the best outcome for released fish. C2 would require non circle hooked fish (J-hook when fishing for other species) to be returned to the water as soon as possible and with careful handling. Both measures combat recreational release mortality which has been determined to have a large effect on F.

#### Option D. Outreach and Education

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-SF supports [Sub-option D1: States would be required to promote best striped bass handling and release practices by developing public education and outreach campaigns. States must provide updates on public education and outreach efforts in annual state compliance reports.](#)

**Reasoning:** States collect license fees, and we believe some of that money should be spent on angler education and more specifically catch and release best practices. Option D2 only recommends that “states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns.” We believe that this should not just be a recommendation but a requirement. Angler education is an essential method to help curb recreational release mortality and ultimately help rebuild the stock to abundance.

## 4.4 REBUILDING PLAN

### 4.4.1 Recruitment Assumption for Rebuilding Calculation

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-SF supports [Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.](#)

**Reasoning:** As we have mentioned, young of year over the past 3 years has been well below average. Combine this with the fact that Addendum 6 only addressed mortality and not rebuilding the stock and now we are in a terrible spot. The writing has been on the wall for years, if you were on the water, it was clear that the stock was in trouble. Option B bases the rebuild of the SSB on the ‘low recruitment regime assumption,’ more in line with the poor year classes previously mentioned. It would likely achieve a lower level of removals and require more restrictive management measures.

### 4.4.2 Rebuilding Plan Framework

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-SF supports [Option B: If the 2022 stock assessment results indicate the Amendment 7 measures have less than a 50% probability of rebuilding the stock by 2029 \(as calculated using the recruitment assumption specified in Amendment 7\) 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.](#)

**Reasoning:** A new stock assessment will be published in October 2022 and depending on the outcome it may have a massive impact on the measures being put in place by Amendment 7. It is an unfortunate situation and likely could have been avoided if the board acted sooner, but it is a concession we should be willing to make to prevent a further delay in developing and putting

into action an addendum to Amendment 7. As noted, it appears the board is willing to allow some sort of public involvement in the process. “Under this option, public comment could be provided during Board meetings per the Commission’s guidelines for public comment at Board meetings, and/or public comment could be provided in writing to the Board per the Commission’s timeline for submission of written public comments prior to Board meetings.”

## 4.6 ALTERNATIVE STATE MANAGEMENT REGIMES

### 4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option B. Restrict the Use of Conservation Equivalency Based on Stock Status

-SF supports [Sub-option B1. Restrictions: CE programs would not be approved when Sub-option B1-a: the stock is at or below the biomass threshold \(i.e., overfished\). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.](#)

**Reasoning:** While we were hoping to see conservation equivalency completely removed from the management process, that is not an option within Amendment 7. The TC has stated that the implementation of CE in the management process is unquantifiable and will likely cloud the regulations put in place by states to reach the overall reductions necessary. Option B, sub-option B1 provides the most limitations to the use of CE by states, some of whom have taken advantage of it. The stock needs to be managed for abundance and therefore we need to let the Commission know that CE has no place in a stock that is overfished with overfishing occurring.

### 4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals

-SF supports [Sub-option C3: CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30.](#)

**Reasoning:** This is the most conservative option available as stated in Amendment 7 “NMFS warns that “[MRIP] Estimates should be viewed with increasing caution as PSEs increase beyond 30. Large PSEs—those above 50—indicate high variability around the estimate and therefore low precision.”. We want to make sure the CE is only accessible with the tightest estimate and least amount of risk.

### 4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries

-SF supports [Sub-option D3: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 50%.](#)

**Reasoning:** An uncertainty buffer refers to the previously mentioned unquantifiable results of states putting CE in place as pointed out by the TC. This will hopefully discourage states from using CE in the first place. We would like to see the biggest buffer possible (50%) put in place to dissuade states from trying to use CE. If they do opt to use it the 50% buffer would hopefully counteract the potential overages in F.

#### 4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries

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-SF supports [Sub-option E2: Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state-specific level.](#)

**Reasoning:** This is a bit convoluted, but the bottom line is that this essentially undoes an unfortunate series of events that transpired during the Addendum 6 process. New Jersey felt that the coastwide 18.5% reduction based on harvest was unfair as it translated to a larger reduction for them due to the complication of the slot limit. The board sided with New Jersey who then ultimately failed to meet its goals and, in the end, took no reduction.

We appreciate your consideration of our comments and the options we believe will best serve Striped Bass. We truly hope that Amendment 7 addresses the issues currently facing the stock and kickstarts it's recovery and rebuilding. Striped Bass must be managed for abundance to ensure that future generations have the chance to sustainably enjoy the resource.

Sincerely,



Taylor Vavra  
Vice President  
Stripers Forever

From: [The Brooklyn Fisherman](#)  
Sent: Friday, April 15, 2022 11:21 PM  
To: [Comments](#); [Emerson Hasbrouck](#); [James Gilmore](#); [Sen. TODD KAMINSKY](#); [Maureen Davidson](#); [CAROL HOFFMAN](#)  
Cc: [2022stripercomments@gmail.com](mailto:2022stripercomments@gmail.com); [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
Subject: [External] Amendment 7 Comments

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Categories: Auto Replied

To the ASMFC,

My name is Arek Zenel-Walasek, a college student studying marine science at Stony Brook University in Long Island, and I am responding to the request for public comments on Amendment 7 for the management of striped bass. The comments below are on behalf of The Tightlylined Conservation Coalition and of course myself. Currently, I am an associate director of the coalition. In every instance I use "we" I am referring to The Tightlylined Conservation Coalition's opinion and then I leave my own opinion on the matter in the consecutive bullet points. Finally, I've left a few personal words at the bottom.

- 4.1 Management Triggers
  - Under Fishing Mortality Triggers we support sub-options A1, B1, and C1
    - Personally I support option A1 and B1
    - I want a large abundance of striped bass so as soon as fishing mortality reaches that specific level it should be reduced, no point in wasting time that allows for more fish mortality
  - Under Spawning Stock Biomass Triggers we support sub-options A2, B1, and C1
  - Under Recruitment Triggers we support sub-options A2 and B2
  - Under Deferred Management Plan we support option A
    - The faster the response, the better!
- 4.2.2 Measures to Address Recreational Release Mortality
  - Under Additional Gear Restrictions we support sub-options C1 and C2
    - Personally I think it would be difficult to make sure that people

follow sub-option C2

- On the other hand in sub-option C1 boats and fisherman could easily be checked for gaffs and other harmful landing devices
- Under Outreach and Education we support sub-option D2
  - Education on proper catch and release methods is extremely important in this day and age with the ever growing catch and release movement
- 4.4.1 Recruitment Assumption For Rebuilding Calculation
  - Under Recruitment Assumption for Rebuilding Calculation we support option B
- 4.4.2 Rebuilding Plan Framework
  - Under Rebuilding Plan Framework we support option B
    - It might seem like an infringement on the public's right to comment but in the state that the striped bass population is in we need to move quickly to make change.
- 4.6.2 Management Program Equivalency
  - Under Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status we support sub-option B1-a
    - When the stock is under threat states should not have the choice to make their own rule and regulations
    - Striped bass migrate up and down the coast so during certain times more conservative approaches should be implemented coast wide instead of each state being able to cherry pick which option they want
  - Under Option C. Precision Standards for MRIP Estimates Used in CE Proposals we support sub-option C3
  - Under Option D. CE Uncertainty Buffer for Non-Quota Managed Fisheries we support sub-option D2

- Under Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries we support sub-option E2

Unlike many of the people sending these emails I am rather young, only 18 years old, so I think I have a different viewpoint on the fishery and where it is going than some others. The decisions made now not only affect future generations but my future and how I fish for striped bass when I'm older. This might come off as being selfish but the outcome of this amendment might not get to be fully appreciated by individuals who are much older than me but I will certainly be able to. That is why I am writing you all this email today. I want to be able to fish twenty years from now and have a serious abundance of striped bass, unlike what we have today, but for that to occur changes must be made. Thank you all so much for your time!

- Arek Zenel-Walasek





April 15, 2022

Emilie Franke, FMP Coordinator Atlantic  
States Marine Fisheries Commission  
1050 North Highland St. Suite 200A-N  
Arlington, VA 22201  
(submitted via email: [comments@asmfc.org](mailto:comments@asmfc.org))

Re: Striped Bass Draft Amendment 7 Comments

Dear Commissioners and Commission Staff:

The Nature Conservancy appreciates the opportunity to provide comments on the Draft of Amendment 7 to the Striped Bass Fishery Management Plan. The Nature Conservancy has programs in all U.S. coastal states. Our marine conservation priorities of healthy and resilient ocean ecosystems, sustainable seafood, and strong coastal communities are closely aligned with those of the state and federal agencies represented at the Commission.

Roughly one year ago, we submitted comments on the draft PID and appreciate the effort Commission staff and the management board have taken to pull together Draft Amendment 7 and usher it through this public comment period. Our staff participated in several of the state hearings and other stakeholder dialogues on this topic. Striped bass support socially and economically important fisheries in many of the east coast states. Indeed, it has become hard to have a thoughtful conversation about fisheries management in the Atlantic without referencing the history of the striped bass stock and the circumstances that have led to where we are now. In decades past, ASMFC's striped bass fishery management was often cited as one of the world's best examples of successful recovery of a major fishery. Unfortunately, we have seen that story turned on its head during the last ten years.

At a time when there are multiple legitimate reasons for federal fishery managers to be talking about the virtues of flexibility, the term has become increasingly controversial on the east coast of the US. We believe this wariness around the term flexibility, which has been obvious in public hearings where stakeholder comments overwhelmingly opposed alternatives that provide more flexibility around management triggers, warrants the Commission's attention. As a recent example, striped bass was repeatedly referenced negatively in conversations around flexibility during the March 29-30 Recreational Fisheries Summit in DC.

While there are nuanced circumstances that led to each of the past management decisions, there is now an overwhelming perception that ASMFC management boards are too frequently pressured towards inaction in the face of early evidence of downturns in stocks. Delays in taking small preventative or precautionary actions all too frequently result in resource declines and the need for more drastic

actions down the road. For almost all stakeholders, these eventual consequences are less desirable than the early modest actions. In addition, state-by-state Conservation Equivalency provisions have twice been used in ways that undercut widely supported coast-wide stock maintenance and rebuilding objectives for the purpose of achieving very short-term increases in the allowable catch for certain states. This dynamic is seriously eroding confidence in the Atlantic States Marine Fisheries Commission as an effective management body. That erosion of confidence has ramifications for voluntary compliance among states and individual fishermen that are essential hallmarks for all fishery management programs.

It is with these underlying circumstances in mind that The Nature Conservancy is drafting these comments. **While our specific preferred options are listed at the end of this letter, we hope you will read through the rationale presented in the following paragraphs which may be applicable for other species boards and decisions before the commission.**

**Take early indicators seriously:** Striped bass young-of-the-year and juvenile surveys provide assessment scientists and resource managers with more early indicators than are available for most other fishery resources. Early warning of strong or poor annual recruitment is a luxury that fishery managers should utilize to the maximum extent, as it allows for proactive science-based actions.

**Don't dismiss modest early actions:** In the last few years “management stability” has been favored over modest regulatory adjustments. This preference has been rationalized by the assumption that the fishing public supports interannual consistency. While there is no doubt that the for-hire fleet and other fishing support industries require early notice of (*e.g.*) season start and end dates, the fishing public has become acclimated to annual rule changes (*e.g.*, size and bag limits) and the need to routinely check regulations, and most can do so with a few clicks on their phone. While we appreciate the desire to provide enough time for management actions to show their impacts, circumstances can quickly change and modest early action may stave off the need for more drastic future measures.

We recognize that state rule making processes can be cumbersome, and yet that shouldn't deter states from making small adjustments when necessary (*e.g.*, a few inch size adjustment). It may be possible for states to streamline the regulatory amendment process (and we are willing to help if/when appropriate). We also point out that divergent management measures for fishermen hailing from adjacent states, particularly for measures such as striped bass size limits, does more to erode public confidence and compliance than would periodic changes to develop consistent management measures for adjacent states.

**Embrace buffers for stability:** If regulatory stability remains a desired goal for the Striped Bass Management Board, then we recommend increasing uncertainty buffers to improve the probability that management provisions will achieve desired fishing mortality rate and biomass targets in the desired time frame. This is particularly relevant given uncertainty related to climate change and its potential impacts on striped bass year class strength.

**Don't let things get worse:** There is no fishery on the east coast that rivals striped bass in terms of economic and social significance. Over the last few decades, management of this species has resulted in annual bag limits of at least one fish per person per day. Any striped bass management option that would result in anything less than one fish in possession per angler would mark a very large departure

in management for states and require large overhauls to the way people fish and the way fishery rules are enforced. We implore the Striped Bass Management Board to recognize that extremely negative public sentiment would result from a bag limit of less than one fish per person. Periodic modest changes, such as slot limits to protect certain year classes, would be far more palatable (and logistically feasible) and hopefully avoid a major paradigm shift for this fishery.

**Voluntarily adhere to federal management standards:** It is our strong opinion that the ASMFC Management and Policy Boards should adopt a posture of adhering to the same minimum standards that govern federal fisheries under the provisions of the Magnuson-Stevens Fishery Conservation and Management Act (MSA). Doing so would greatly simplify circumstances for jointly managed species. If there are cases where species management boards have strong rationale for pursuing options that would not be deemed permissible under MSA, then the rationale and benefits for such decisions should be clearly articulated, justified, and followed by transparent retrospective evaluation of the consequences. Following this tack, the Commission could demonstrate the *benefits* of flexibility in fisheries management.

**Targeted cohort protections:** Given the year-class strength indicators that are available for striped bass, slot size limits can be an effective way to protect either strong or weak year class cohorts. This approach is best achieved with uniform coast-wide slot limits. The existence of fisheries in some states for fish outside of the slot limits undercuts the efficacy of slot size regulations in adjacent states. This is a recurring issue that the Striped Bass Management Board needs to reconcile.

**Constrain the use of conservation equivalency:** Conservation Equivalency (CE) proposals can have value in the menu of options available to ASMFC management boards, but recent application of CE by the Striped Bass Management Board is not demonstrating effectiveness. The information necessary for forecasting equivalency is typically not precise or accurate enough, yet state delegations are pressured by some segments of the fishing industry into proposing CE, state assessment teams feel compelled to advocate for them, and managers who strive to work collaboratively with their neighboring states feel compelled to approve them. When divergent measures are put forward by different states, they can undermine one another, and it becomes virtually impossible for assessment scientists to retroactively determine which measures met their goals and which failed. For striped bass, everyone pays the price when a CE proposal fails to achieve the overarching plan goals.

Taken to their extreme, CE provisions can undercut coast-wide management objectives and the value of managing migratory fish stocks in a cohesive and effective way. The way CE provisions have been applied in the striped bass fishery, including the timing of CE proposal presentations sequenced *after* soliciting extensive public comments on consistent coast-wide measures, is a major contributor to the erosion of stakeholder confidence in the efficacy of ASMFC as a management body and has served to pit states against each other, particularly where adjacent states share the same fishing areas. Therefore, we recommend limiting when and how CE can be used, and how the management board directs technical staff to conduct CE efficacy forecasts and hindcast evaluations.

**Fishing on spawning and staging fish:** Reducing the harvest of reproductive-sized striped bass on spawning grounds and reducing harvest of striped bass while they are vulnerably aggregated in downstream spawning ground staging areas deserves serious consideration. While striped bass

harvest is already restricted in some spawning areas, additional location-specific actions may be warranted. We are cognizant that it is difficult for the Striped Bass Technical Committee to precisely forecast the conservation benefits of such actions. We are also aware that temporally and spatially targeted recreational and commercial harvest closures aimed at protecting spawning and staging fish could have local social and/or economic consequences, and that in some geographies it will likely be necessary or beneficial to thoughtfully incorporate local expert advice and perspectives on how such efforts could be narrowly focused in space and time to reduce social and economic impacts while still achieving the desired results.

As presented in the Draft Amendment, Options B2-a and B2-b may not be nuanced enough to account for local circumstances and conditions. We encourage more investigation into potential actions to achieve that goal-- either actions taken up by individual states or as part of a subsequent plan Addendum following the completion of the next striped bass stock assessment. States could initiate conversations with potentially impacted segments of the fishing communities around the important spawning grounds to explore state-led options for protecting breeding-sized fish while they are spawning and aggregating in staging areas, including revisiting previously derailed conversations between NY and NJ concerning jointly delaying the start of the striped bass harvest season in the Hudson River staging areas around Raritan Bay.

Given the complexity and number of options in the draft Amendment, we appreciate the challenges that Commission staff will have in tallying option preferences during this public comment period. Accordingly, we simply present our support for various plan alternatives in the order in which they are presented in the draft plan. Our support for these options is based on the general rationale we shared above.

#### **Section 4.1**

##### **Tier 1: Fishing Mortality Triggers**

Option A – Support Sub-Option A1

Option B – Support Sub-Option B1

Option C – Support Sub-Option C1

##### **Tier 2: SSB Triggers**

Option A – Support Sub-Option A2

Option B – Support Sub-Option B1

Option C – Support Sub-Option C1

##### **Tier 3: Recruitment Triggers**

Option A – Support Sub-Option A2

Option B – Support Sub-Option B2

##### **Tier 4: Deferred Management Plan**

Support Option A

#### **Section 4.2.2 Measures to Address Recreational Release Mortality**

Option B – no preferred option see explanation in section above titled “Fishing on Spawning and

Staging Fish”

Option C – Support Sub-Option C1 and Sub-Option C2

Option D – Support Sub-Option D2, with the addition that education could include explanation of reducing fishing pressure in spawning and staging areas.

#### **Section 4.4.1 Rebuilding Plan**

Support Option B

#### **Section 4.4.2 Rebuilding Plan Framework**

Support Option B

#### **Section 4.6.2 Management Program Equivalency**

Option B – Support Sub-Option B1-a

Option C – Support Sub-Option C3

Option D – Support Sub-Option D2

Option E – Support Sub-option E2

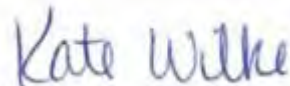
In closing, we are heartened by the number of striped bass fishermen and trade interests that have raised their voices the last few years in support of rebuilding the striped bass population and maintaining levels of abundance that have been shown to have socio-economic benefits to coastal communities throughout the range of the striped bass population. We encourage the Commission to consider the overall approaches that we present in the first section of this letter, and to adopt the management alternatives that we have expressed support for in the second section of this letter. We are rooting for the Atlantic States Marine Fisheries Commission to be successful. As always, please reach out if you have questions or there is anything that we can do to contribute to the Commission’s success in achieving sustainable fisheries on the Atlantic coast.

Sincerely,

Carl LoBue

and

Kate Wilke



NY Ocean Program Director  
The Nature Conservancy  
Cold Spring Harbor NY 11724  
clobue@tnc.org

Fisheries Scientist, Mid-Atlantic  
The Nature Conservancy  
Virginia  
kate.wilke@tnc.org



# TRADITIONAL SURFCASTERS

LONG ISLAND, N.Y.

February 24, 2022

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

Dear Emilie;

The members of The Traditional Surfcasters are offering these comments concerning the proposed Amendment 7 on striped bass management because we are concerned about the dramatic decline in the striped bass population. Some of our members are activists for fisheries management, and have been for decades.

Although striped bass management Amendments have afforded striped bass some protection, we continue to be concerned about a number of weaknesses in management regulations that have resulted in a number of significant downturns in population size.

**The option choices listed below reflect the following concerns.** We summarize as follows.

1. We believe the existing rules and process inhibit timely ASMFC responses to declines.
2. We believe the measures taken in past years do not offer a high enough probability of success.
3. The framework for restoring the female spawning biomass does not allow for a rapid rebuild.
4. We believe that existing conservation equivalency procedures compromise stock rebuilding and population size stability.
5. We believe the resource should be managed for striped bass and, with a little patience, would lead to a more stable population.
6. Catch and release mortality is a concern for our club and we have gone to some lengths to educate not only our new members, but also the greater fishing community on more effective catch and release methods. However, we wonder why catch and release mortality among draggers and gillnetters who target schools of striped bass for a small quota and then discard the rest dead does not receive much attention.

## **Management Options We Support:**

### **Tier 1: Management Triggers:**

- Option A1
- Option B1
- Option C1

### **Tier 2: Female Spawning Biomass:**

- Option A2
- Option B1
- Option C1

### **Tier 3: Recruitment Triggers:**

- Option A3
- Option B2

### **Tier 4:**

- Option A

### **4.2.2: Recreational Release Mortality (we oppose B1 and B2)**

- Option A
- Option C1
- Option C2
- Option D1

### **4.4.1: Rebuilding Plan:**

- Option B

### **4.4.2: Plan Framework:**

- Option B

### **4.6.2: Management Program Equivalency:**

- Sub-option B1a
- Sub-option B1c
- Sub-option B2b
- Sub-option C3
- Sub-option D3
- Sub-option E2

Thank you for your time and consideration:

Sincerely;

Drew Muller

Secretary, Traditional Surfcasters



100 Shockoe Slip Richmond, Virginia 23219-4140  
*Telephone:* 804.649.7545 *Facsimile:* 804.780.1813  
*Website:* [www.t-mlaw.com](http://www.t-mlaw.com)

Michael J. Quinan  
Direct Dial: (804) 799-4127  
Facsimile: (804) 780-1813  
E-mail: [mquinan@t-mlaw.com](mailto:mquinan@t-mlaw.com)

April 15, 2022

**Via email: [comments@asmfc.org](mailto:comments@asmfc.org)**

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

Subject: Draft Amendment 7  
Atlantic Striped Bass Fishery Management Plan

Dear Ms. Franke:

The Twin Rivers Waterman's Association and the Virginia Waterman's Association (collectively the "Watermen") represent the interests of commercial fishermen of Striped Bass in the Chesapeake Bay in Virginia. The Watermen submit these comments concerning Draft Amendment 7 to the Atlantic State Marine Fisheries Commission ("ASMFC") Interstate Fisheries Management Plan for Atlantic Striped Bass (the "Plan") issued for public comment in February 2022 ("Draft Amendment 7"). The Watermen also appeared, by counsel, and offered their observations on Draft Amendment 7 during the Virginia public hearing on March 9, 2022. These written comments restate and expand upon those remarks. We hope you will accept these comments as a supplement to those.

To begin, there are three main points we hope the Atlantic Striped Bass Fishery Management Board (the "Board") will take into account in considering Draft Amendment 7. The first point relates to regional circumstances. The circumstances of both the fish and the fishermen differ greatly from region to region, from season to season and among the many different environmental conditions found from one end of the striped bass fishery to the other. There are no one-size-fits all solutions that will improve the condition of the fishery or that would be fair to all the fishermen. The Plan needs to allow for flexibility, especially regional flexibility, if the regulations implemented under the Plan are going to be effective.

The second point relates to changes in circumstances. Circumstances are changing, as is most obviously seen in climate change, but other factors also come into play. The pandemic for example. Commercial fishermen not only need to be able to catch fish, they need to be able to sell fish, and the pandemic certainly had an impact on the market for striped bass. The regulators and their regulations need to support commercial fishermen in rough times. Just as they need to



Emilie Franke, FMP Coordinator  
April 15, 2022  
Page 2

support recreational fishermen. Everyone benefits from a healthy and robust fishery below the water, but the Plan needs to support the fishery above the water as well. It is possible to do both, but to do both the industry needs to be regulated with eyes open. For instance, careful attention is going to need to be paid to this year's benchmark stock assessment.

Third, in order to provide effective solutions, regulations need to focus on what the problems actually are. The principal problem faced by the Atlantic Striped Bass fishery is recreational release mortality. Bag limits and size limits cannot be effective when they do not reduce, in fact they only increase, releases resulting in fishing mortality. In any case, the commercial fishermen have been regulated by quotas, and tightening those quotas or maintaining overly restrictive quotas isn't going to help the fishery. It only hurts the fishermen.

The Board should keep these principal points in mind as it addresses the proposed amendment to the Fishery Management Plan. In four areas in particular, the Board has requested input:

1. With regard to Management Triggers, there is a need for management stability. The Board should consider options that provide reasonable amounts of time for management actions to take effect before they substitute new and different management actions. The Board should also give serious consideration to deferred management action options so that the best and most current information can be used in its decision-making process.
2. With regard to Recreational Fishery Management Measures, the Watermen are not going to make specific suggestions about how to fix the problem of recreational release mortality, except to point out again that there is a very specific well-established problem being caused by recreational fishing, and it cannot be solved by over-regulating the commercial fishing industry. Recreational fishing accounts for over 80% of total removals by number (87% in 2019 and 2020), and recreational dead discards alone represent 54% of total striped bass removals.<sup>1</sup> Commercial fishing, by contrast, accounts for only approximately 13% of total removals (13.5% in 2019 and 12.6% in 2020), with less than 2% resulting from commercial discards.<sup>2</sup>
3. With regard to the Rebuilding Plan, whatever options the Board selects, it should keep in mind the viability of the fishing community as well as the vitality of the fish. The entire fishing community, recreational and commercial, obviously wants and would benefit from a healthy and robust fishery. As long as the Board and the state regulators keep their eyes open as to what is happening both above and below the waterline, we can have both.

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<sup>1</sup> Draft Amendment 7, pp. 10-11.

<sup>2</sup> *Id.* at 10.

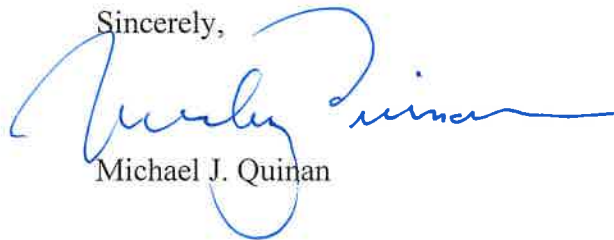
Emilie Franke, FMP Coordinator  
April 15, 2022  
Page 3

4. Finally, with regard to Alternative State Management Regimes, or Conservation Equivalencies, if the Board and state regulators are keeping their eyes open, they will see the differences between the commercial and recreational fishing communities, between the different regions and environments, and among the different circumstances that are encountered throughout the entire striped bass fishery. At this time, conservation equivalency is the only way that regulators are able to recognize the different circumstances faced in the different regions and by the different segments of the fishery. It is essential that conservation equivalencies continue to be made available on a reasonable basis. Any restrictions on conservation equivalency should be limited. Sub-option B2-c, which would extend such restrictions to commercial fisheries, should not be adopted. Under the status quo, the Board has broad discretion regarding the use and approval of conservation equivalency. It is important that the Board's flexibility be maintained. Otherwise, the Plan would provide no way to address overly broad, inefficient and inappropriate regulations, as they are applied in specific circumstances.

When considering the provisions, and especially the options presented, in Draft Amendment 7, the Board should first recognize the problems requiring solutions do not arise from commercial fishing, as addressed above. In addition, the Board should recognize that the problems do not arise in Virginia. In recent years, juvenile recruitment of Striped Bass in Virginia has been consistently strong. As noted by VIMS in its Annual Progress Report for 2020-2021, "In the past decade, recruitment has been average or above average in all but one year (2012), indicating production has been relatively consistent in Virginia nurseries during this time."<sup>3</sup> The causes of the problems being experienced by the Striped Bass fishery are to be found elsewhere, not in the commercial fishery and not in Virginia, and the solutions to be adopted should be focused on those causes.

The Watermen, and all of the commercial fishermen of the Chesapeake Bay in Virginia, greatly appreciate your consideration of these comments.

Sincerely,



Michael J. Quinan

MJQ

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<sup>3</sup> Virginia Institute of Marine Science, Estimation of Juvenile Striped Bass Relative Abundance in the Virginia Portion of Chesapeake Bay, Annual Progress Report: 2020-2021, p. 7. See also, Table 2



Emilie Franke, FMP Coordinator  
April 15, 2022  
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cc: Douglas F. Jenkins, Sr., Twin Rivers Waterman's Association  
J.C. Hudgins, Virginia Waterman's Association



April 15, 2022

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

Dear Ms. Franke,

The Virginia Anglers Club is a thriving 60+ year old fishing club in Richmond, Virginia. With over 100 members, our club has a historic connection with the Chesapeake Bay and striped bass. We know the time is now to act strongly and protect the future of striped bass. I believe Capt. Chris Dollar, our Conservation & Legislation chairman summed it up best when he said, "Stripers should be managed for maximum abundance, not maximum harvest."

We appreciate the work put forth to develop Draft Amendment 7 to the Atlantic Striped Bass Fishery Management Plan. Equally as important, we appreciate the many individuals and conservation groups who have helped educate anglers on this comprehensive management plan for striped bass.

The Virginia Anglers Club collectively supports the specific recommendations by the Virginia Saltwater Sportfishing Association and the Coastal Conservation Association.

We thank you for all you do and this opportunity to share our comments.

Sincerely,

Capt. Mike Ostrander  
Virginia Anglers Club  
President  
Mike@DiscovertheJames.com  
804-938-2350

Virginia Anglers Club  
PO Box 70520  
Richmond, Virginia 23255





Steve Atkinson  
President

March 27, 2022

David Tobey  
Vice President

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

Mike Avery  
Treasurer

John Powers  
Secretary

RE: Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass

Dear Ms. Franke,

The Virginia Saltwater Sportfishing Association was founded in 2015 and currently represents over 600 anglers and six fishing clubs in the Commonwealth of Virginia. According to Southwick Associates, the Striped Bass fishery provides a huge socio and economic value with over 100,000 jobs, generating close to \$8 billion annually. At one time, in the not-too-distant past, Striped Bass represented a huge success story in rebuilding a stock.

Unfortunately, since that previous rebuilding occurred, ASMFC's Striped Bass Management Board has been slow to react in maintaining this iconic fishery. Due to the previous inaction from the Striped Bass Management Board, VSSA believes immediate action is called for in rebuilding the Striped Bass population and supports the most conservation-oriented positions.

VSSA submits the following recommendations for The Striped Bass Management Boards consideration.

#### **MANAGEMENT TRIGGERS – Section 4.1**

Tier 1 Fishing Mortality Triggers - VSSA strongly believes we should maintain the Status Quo on the existing Management Triggers. Accordingly, VSSA supports:

- Option A1: status quo - Reduce F to a level that is at or below the target within one year.
- Option B1: status quo – Same as Option A1 - Reduce F to a level that is at or below the target within one year
- Option C1: status quo - If F exceeds the F target for two consecutive years... the striped bass management program must be adjusted to reduce F to a level that is at or below the target within one year.

Tier 2-Female Spawning Stock Biomass (SSB) Management Triggers – implements a 2-year deadline to act and forces a 10-year rebuilding plan (no more kicking the can down the road).

- Option A2: VSSA supports a 2-year deadline to implement a rebuilding plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.
- Option B1: VSSA supports the status quo
- Option C1: VSSA supports the status quo

#### **Board of Directors**

Travis O'Neil,  
Chairman

Curtis Tomlin,  
Advisor

Mike Avery

John Bello

Adrian Marchi Jr.

Jerry Hughes

Travis O'Neal

CJ Johnson

David Tobey

Gary Davis

Steve Atkinson

John Powers

John Page Williams



Tier 3-Recruitment Triggers – VSSA supports using trigger alternative with higher sensitivity.

- **Option A2:** The recruitment trigger more sensitive than the status quo but less sensitive than sub-option A3. This trigger alternative would have tripped three times since 2003: NY in 2006; MD in 2010; MD in 2014 (**VSSA position revised 030822**)
- Option B2: If the recruitment trigger is tripped...F target must be reduced within one year

Tier 4- Deferred Management Actions. VSSA believes immediate action is required (no more kicking the can down the road).

- Option A: No deferred action if any or all of the triggers are tripped, the board is required to act.

**RECREATIONAL RELEASE MORTALITY- Section 4.2.2** The Draft Amendment 7 Plan denotes number of fish that die after release is greater than the harvest. VSSA believes steps must be taken now to reduce mortality. Accordingly, VSSA supports both effort controls (seasonal closures) and gear restrictions.

- Option A: VSSA supports the status quo (circle hook measures)
- Option B1: limited support – State Specific Two-Week Closures. VSSA notes two weeks may or may not be enough. For example, VSSA believes the current two-week closure is woefully inadequate in Maryland during the warm summer months.
- Option B2: VSSA supports – Effort Closures in Spawning Area for both Recreational and Commercial Harvest. Additionally, VSSA strongly believes there should be additional restrictions placed on the commercial harvest of pre-spawn Striped Bass. We are not saying reduce the commercial quota. We advocate moving the harvest to non-pre-spawn months.
- Option C1: VSSA supports - Additional Gear Restrictions – permit only non-lethal devices for removing fish.
- Option C2: VSSA supports - Additional Gear Restrictions – any fish caught on any unapproved method must be returned to the water
- Option D1: VSSA supports – Outreach and Education – States are required to develop public education and outreach campaigns

#### **REBUILDING PLAN – Section 4.4.1**

- Option B: VSSA supports rebuilding the female SSB no later than 2029 using the low recruitment regime assumption and understands that may result in more restrictive management measures

#### 4.4.2 Rebuilding Plan Framework

- Option B: VSSA supports permitting the Management Board to take action in response to 2022 benchmark assessment without having to go through an amendment or public comment period.

**MANAGEMENT PROGRAM EQUIVALENCY – 4.6.2** aka Conservational Equivalency (CE). The current use of CE allows states too much flexibility in meeting ASMFC directives. In the last Management Action, the Board was faced with in excess of 40 CE proposals from the states with no penalties if the CE plans failed. VSSA strongly believes Conservation Equivalency should not be allowed or used when the fishery is overfished and overfishing is occurring. Not allowing CE was not one of the options presented.

Accordingly, VSSA supports the following:

- Sub-Option B1a: VSSA supports no CE when the stock is at or below the biomass threshold.
- Sub-Option B1c: VSSA supports no CE when the fishing mortality is at or above the fishing mortality threshold.
- Sub-Option B2b: VSSA supports no Quota managed recreational fisheries (e.g., bonus programs)



- Sub-Option C3: VSSA supports Default Precision Standards for MRIP Estimates – 30%
- Sub-Option D2: VSSA supports Default CE uncertainty buffer non-quota managed fisheries – 25%. This option provides states with an incentive to design specific CE efforts to increase accuracy.
- Sub-Option E2: VSSA supports Percent reduction at the state-specific level

As additional information, if CE is allowed, VSSA believes payback should be required in the following year for any state not meeting the objectives set in any approved CE proposal.

**Public comment was not requested on section 5.6.1 Spawning Area Closures** (Pg 89 of the PID)

VSSA strongly endorses the prohibition of fishing on the spawning grounds during the spawning season. In addition to the mandatory spawning closures [if selected in Section 4.2.2; delete if not-selected], states are encouraged to maintain existing spawning closures and evaluate the need for additional spawning closures.

VSSA submits the following Comment on Section 5.6.1:

- VSSA firmly believes if any area is closed for any reason, neither recreational nor commercial fishing should be allowed in that area. If one sector (recreational or commercial) is not allowed to harvest during any period, neither sector should be allowed to harvest. Moreover, VSSA believes the Spawning areas should be closed pre spawn to both Recreational and Commercial harvest. We are not advocating Commercial quota be reduced; we advocate the harvest effort be shifted away from the pre spawning period.

Amendment 7 will set the course for the future of this iconic fishery. VSSA urges the Striped Bass Management board to act with urgency and implement the measures necessary to rebuild this fishery. Thank you in advance for considering our position on the issues in Amendment 7.

Respectfully,

A handwritten signature in blue ink, which appears to read "John J. Bello".

John J. Bello  
Chair – Government Relations Committee





March 22, 2022

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

**RE: Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass**

Dear Ms. Franke,

*Wild Oceans*, a conservation organization founded by anglers in 1973, engages in marine fisheries management to work toward a healthy ocean and a vibrant fishing future. Along the Northeast Atlantic coast, striped bass is arguably the most iconic recreational species with tremendous socio-economic value. Striped bass recreational fishing supports over 100,000 jobs and generates nearly \$8 billion annually for our economy.<sup>1</sup> By weight, striped bass top the list of recreational species caught in the Mid-Atlantic and New England regions.<sup>2</sup> Because of a broad geographic distribution and a life history that spans inland and open ocean waters, striped bass are intricately woven into the Greater Atlantic food web, occupying a critical ecological niche.<sup>3</sup>

We commend the Atlantic Striped Bass Management Board (Management Board) for hearing calls from the public to rebuild striped bass within the required 10-year period and to maintain the management plan goal, objectives and reference points that recognize the importance of maintaining female spawning stock biomass at the target level to provide for a broad age structure that is necessary for long-term reproductive success. By and large, Draft Amendment 7 to the Atlantic Striped Bass Interstate Fishery Management Plan (ISFMP) is responsive to the feedback received during the comment period on the Public Information Document (PID). Amendment 7 will establish a new management program that will guide Management Board decisions for years to come. It is important to recognize the interconnectedness of the management options in order to choose a final suite of

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<sup>1</sup> Southwick Associates. 2019. The economic contributions of recreational and commercial striped bass fishing. A report produced for: The McGraw Center for Conservation Leadership. Revised April 12, 2019. 69 pp.

<sup>2</sup> An average of 23 million pounds of striped bass were harvested annually from 2017-2021. An additional 33 million pounds were caught and released annually over the same time period. (Source: NOAA Fisheries Recreational Fisheries Statistics Queries.)

<sup>3</sup> Walter JF III, Overton AS, Ferry KH, Mather ME. 2003. Atlantic coast feeding habits of striped bass: a synthesis supporting a coast-wide understanding of trophic biology. *Fish Man Ecol* 10:349-360.



alternatives that best aligns with the management goal and objectives and addresses concerns raised by the fishing public. On behalf of *Wild Oceans*, I am pleased to provide our recommendations.

#### **Section 4.1: Management Triggers**

By design, the management triggers are meant to achieve the goal and objectives of the ISFMP. However, even with triggers implemented through Amendment 6, striped bass continued to decline to an overfished condition and chronic overfishing has occurred over the last decade. How and when the Management Board takes corrective action in response to a trigger is critical to its effectiveness. **We support the following suite of management trigger options to guide prompt and effective management responses:**

- **Tier 1: Fishing Mortality Management Triggers**
  - Option A: Timeline to Reduce F to the Target
    - **Sub-option A1** (status quo): Reduce F to a level that is at or below the target within one year.
  - Option B: F Threshold Triggers
    - **Sub-option B1** (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.
  - Option C: F Target Triggers
    - **Sub-option C1** (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.
- **Tier 2: Female Spawning Stock Biomass (SSB) Management Triggers**
  - Option A: Deadline to Implement a Rebuilding Plan
    - **Sub-option A2**: Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.
  - Option B: SSB Threshold Trigger
    - **Sub-option B1** (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].
  - Option C: SSB Target Trigger
    - **Sub-option C1** (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].
- **Tier 3: Recruitment Triggers**
  - Option A: Recruitment Trigger Definition
    - **Sub-option A2**: The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA) shows an

index value that is below 75% of all values (i.e., below the 25<sup>th</sup> percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

- Option B: Management Response to Recruitment Trigger
  - **Sub-option B2:** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

- **Tier 4: Deferred Management Action**

- **Option A (status quo):** No Deferred Management Action.

#### **Section 4.2.2 Measures to Address Recreational Release Mortality**

The great majority of striped bass caught in the recreational fishery is released alive, but as the Amendment 7 document points out, the estimated number of fish that perish after release exceeds the number of striped bass that are harvested, making post-release mortality the most significant contributor to overall fishing mortality. Taking steps to reduce post-release mortality should be part of a comprehensive effort to rebuild the stock. To this end, we support options that build on existing state efforts to protect vulnerable spawning fish, restrict harmful gear and expand angler education and outreach regarding best practices. **We support the following options:**

- Option B: Effort Controls (Seasonal Closures)
  - **Sub-option B2-a:** No-Harvest Spawning Closure Required: All recreational harvest of striped bass would be prohibited during Waves 1 and 2 (January through April) in the following spawning areas to protect pre-spawn and spawning fish: Chesapeake Bay, Delaware River/Bay, Hudson River, and Kennebec River. States bordering these areas will determine the boundaries of closures. *We note that Draft Amendment 7 calls on the Technical Committee to review new information on the timing of striped bass spawning and recommend changes to the timing of spawning closures if needed. A January through April closure may not adequately protect spawning aggregations in northern states where striped bass are known to spawn until late spring/early summer, and it will be important to track the efficacy of this measure to determine if changes are warranted through adaptive management (Section 4.7.2).*
- Option C: Additional Gear Restrictions
  - **Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.
  - **Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.
- Option D: Outreach and Education
  - **Sub-option D2:** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts

in annual state compliance reports. Best practices could include those listed in sub-option D1.

#### **4.4 REBUILDING PLAN**

During the public comment period for the Amendment 7 PID, we along with a majority of other stakeholders expressed concern over the lack of a plan that would rebuild the striped bass stock by the required deadline of 2029 (10 years after the Management Board approved the benchmark stock assessment that found striped bass to be overfished). To many, it seemed that there was a lack of resolve on the part of managers to adhere to the rebuilding requirements. We are pleased that the Management Board heard these concerns and addressed them by adding rebuilding plan options to the amendment draft. We are in favor of calculating  $F_{\text{REBUILD}}$  using more realistic and current recruitment assumptions.<sup>4</sup> A mechanism that enables the Management Board to respond to the 2022 assessment update in a timely manner in order to keep the rebuilding plan on track would be a prudent addition to the management plan. **We express our strong support for the following options:**

##### **Section 4.4.1 Recruitment Assumption for Rebuilding Calculation**

- **Option B:** Rebuild female SSB to the SSB target level by no later than 2029.  $F$  rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis. Note: This approach is more conservative than Option A. Using the low recruitment assumption in Option B would likely result in a lower  $F$  rebuild than under Option A. To achieve a lower  $F$  rebuild (i.e., a lower level of fishery removals), more restrictive management measures may be required if Option B is selected as compared to Option A.

##### **4.4.2 Rebuilding Plan Framework**

- **Option B:** 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 recruitment assumption specified in Amendment 7) 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.

##### **4.6.2 Management Program Equivalency (Conservation Equivalency)**

Conservation Equivalency (CE), as currently applied to the management plan for striped bass, allows states and jurisdictions to sidestep conservation measures necessary for ending overfishing and rebuilding the stock. This issue came to light when 36 conservation equivalency proposals were submitted by 9 out of the 13 states and jurisdictions on the management board in response to the recreational measures in Addendum VI to Amendment 6, the action designed to address overfishing and reduce striped bass fishing mortality to the target.<sup>5</sup> Most troubling is that in many cases, equivalency to the fishery management plan standard cannot actually be determined, and because of this, measures to hold states accountable for the performance of their CE programs were not developed for Amendment 7 (see p. 75 of Draft Amendment 7). When the female spawning stock

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<sup>4</sup> The Technical Committee analysis identified the most recent 14 years for which recruitment data are available (2007-2020) as a low recruitment regime.

<sup>5</sup> Atlantic Striped Bass Technical Committee. Memo to the Atlantic Striped Bass Management Board. 28 Jan 2019.

biomass falls below the threshold or when the fishing mortality threshold is exceeded, conservation equivalency should not be granted for any state or jurisdiction. **We support the following options, which would greatly improve upon the current CE program by clearly defining “equivalency” in a manner that ensures coastwide conservation objectives are met, preventing the use of CE when the stock is in jeopardy, establishing data quality standards, and applying a reasonable buffer to account for uncertainty:**

- Option B: Restrict the Use of Conservation Equivalency Based on Stock Status
  - **Sub-option B1-a:** the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.
  - **Sub-option B1-c:** fishing mortality is at or above the fishing mortality threshold (i.e., overfishing is occurring). CE programs would not be considered until a subsequent stock assessment indicates fishing mortality is below the threshold level.
- Option C: Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals
  - **Sub-option C3: 30.** *This is consistent with the National Marine Fisheries Service MRIP guidance which warns that estimates with a Percent Standard Error (PSE) of 30 or greater “are not considered sufficiently reliable for most purposes.”*
- Option D: Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries
  - **Sub-option D2: 25%**
- Option E: Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries
  - **Sub-option E2:** the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Amendment 7 to the Atlantic Striped Bass Interstate Fishery Management Plan will be the foundation for rebuilding the stock and will likely guide management and conservation decisions for years beyond the rebuilding period. *Wild Oceans* believes that the above-recommended options will work in concert to establish a robust plan for sustaining this vitally-important fish and the diverse fisheries and fishing communities it supports. Thank you for taking our recommendations into consideration.

Sincerely,



Pam Lyons Gromen  
Executive Director

# CBF Form Letter submitted by 2,461 individuals

From: [REDACTED]  
Sent: Wednesday, April 13, 2022 9:51 PM  
To: [Comments](#)  
Subject: [External] Restoring an Iconic Fish with Amendment 7

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Categories: Recieved no auto reply

Dear ASMFC Fishery Management Plan Coordinator Emilie Franke,

I wish to provide the following comments on the Atlantic States Marine Fisheries Commission's (ASMFC) Draft Amendment 7. Striped bass are one of the most important fish species along the Atlantic coast, supporting robust recreational and commercial fisheries. The importance of striped bass is reflected in its status as Maryland and Virginia's state fish, a designation that represents its importance to the states' economies and culture. As such, the current striped bass population decline is of serious concern to me and ensuring their population is restored quickly should be the primary objective of the ASMFC throughout the Amendment 7 process. Below are specific comments on the most important issues presented in the draft amendment.

## Management Triggers

Management triggers, although extremely complex, are a critical part of the fishery management plan that set the conditions under which fishery managers need to take action in order to improve the health of populations. Unfortunately, history has shown this did not happen. Moving forward, ASMFC must adhere to the use triggers that help the Board effectively manage the species.

In general, I support the continued use (status quo) of the current fishing mortality triggers contained in Tier I. This includes the following specific options:

- Option A: Sub-option A1 which would keep the one-year timeline for reducing mortality below the target.
- Option B: Sub-option B1 which would use the timeline adopted in Option A for reducing mortality below the threshold.
- Option C: Sub-option C1 which would keep the current Target Trigger for mortality and spawning stock biomass using the timeline adopted in Option A.

For the Tier 2 Female Spawning Stock Biomass (SSB) Management Triggers, I support the following specific options:

- Option A: Sub-option A2 which would require the implementation of a rebuilding plan.
- Option B: Sub-option B1 which would seek to rebuild the striped bass populations in 10 years.
- Option C: Sub-option C1 which would keep the current SSB trigger than requires rebuilding the population within 10 years.

For the Tier 3 Recruitment Triggers I support Option A: Sub Option A3.

For the Tier 4 Deferred Management Options, I strongly support Option A: No Deferred Management Action.

#### Recreational Fishery Management Measures

I support Option B along with the following sub-options:

- Option B2-a which would prohibit the recreational harvest of striped bass from January through April in the Chesapeake Bay spawning areas.
- Sub-option D1 which would require states to promote practices that reduce mortality of striped bass in the recreational fishery.

#### Rebuilding Plan Framework

I support Option B which would provide the Board the ability to quickly respond to the results of the 2022 stock assessment if additional conservation actions are warranted.

#### Conservation Equivalency

Now is the time to reconsider the widespread use of conservation equivalency in the management of the striped bass fishery. Unfortunately, poorly planned conservation equivalency proposals have all too often resulted in less than intended conservation benefit, with few consequences for the managers who have developed them. This has unfortunately, left the biological condition of the stock in worse shape that it should have been. Particularly when the striped bass stock is in poor condition, the use of conservation equivalency should be restricted in order to focus on the rebuilding of the coastwide population.

In order to begin the process to revise the conservation equivalency program I support Option B: Restrict the Use of Conservation Equivalency Based on Stock Status and Sub-option B1-a which would limit the use of conservation equivalency while the population is at or below the threshold.

Thank you for consideration of these comments and for allowing me to participate in the public comment period for Draft Amendment 7.

Sincerely,

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# BHA Form Letter submitted by 251 individuals

From: [mailagent@thesoftedge.com](mailto:mailagent@thesoftedge.com) on behalf of [REDACTED]  
Sent: Friday, April 15, 2022 9:58 PM  
To: [Comments](#)  
Subject: [External] Draft Amendment 7 - BHA

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Categories: Auto Replied

Dear Members of the Management Board:

As a supporter of Backcountry Hunters and Anglers I appreciate the opportunity to provide comments on Draft Amendment 7, and to advise the ASMFC on the general priorities and specific options I would like to see included in Amendment 7.

Since Amendment 6 was adopted in 2003 the stock has declined to overfished levels because excessive overfishing has been allowed. I feel that some significant changes are needed to reverse this trend, and that the overall goals for Amendment 7 should be to recover the Striped Bass stock as soon as reasonably possible and to implement policies to ensure target levels are maintained long-term after recovery.

To accomplish these goals, I urge the Board to include the following options in Amendment 7:

#### 4.1 Management Triggers

Tier 1 - A1, B1, C1

Tier 2 - A2, B1, C2

Tier 3 - A2, B2

Tier 4 - A

#### 4.2.2 Recreational Release Mortality

Sub-Options C1, C2, D2

#### 4.4 Rebuilding Plan

4.4.1 Option B

4.4.2 Option B

#### 4.6.2 Management Program Equivalency

Sub-options B1-a, C3, D2, E2

Thank you for your consideration,

[REDACTED]  
[REDACTED]  
[REDACTED]

# ASA Form Letter submitted by 217 individuals

From: [REDACTED]  
[REDACTED]  
Sent: Friday, April 15, 2022 11:56 PM  
To: Comments  
Subject: [External] KAF Comments on Draft Amendment 7

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Categories: Filed but no auto reply

Dear Ms. Franke,

As a striped bass angler, I support balancing precautionary management with regulatory stability and reasonable access to the fishery. To achieve that, I support the following options.

Management Triggers:

Fishing Mortality Triggers:

Timeline to Reduce F to the Target, I support Sub-option A1 (status quo) 1 year.

F Threshold Trigger, I support Sub-option B1 (status quo) If F exceeds the threshold in a single year, action must occur to reduce F to the target within timeframe selected under sub-option A (supported A1 above).

F Target Trigger, Support Sub-option C1 (status quo) if F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, must reduce F to a level that is at or below the target within the timeframe selected under sub-option A (supported A1 above).

Spawning Stock Biomass Triggers

Deadline to Implement a Rebuilding Plan, I Sub-Option A2: Two-Year Deadline

SSB Threshold Trigger, I support Sub-option B1 (status quo) Rebuild when SSB in a single year falls below the threshold.

SSB Target Triggers, I support Sub-option C3. No management trigger related to SSB target because F target trigger also has an SSB target component and managers directly control F.

Recruitment Triggers

Recruitment Trigger Definition, I support Sub-option A2: Moderate Sensitivity Recruitment Trigger.

Management Response to Recruitment Trigger, I support a variation of Sub-option B2. The Board use an interim F target calculated using the low recruitment assumption and then during the next stock assessment it evaluates F against the new interim F target and simultaneously evaluates all the other management triggers to determine if action is needed.



Deferred Management Action, I support Option A. No deferred management action. Stock assessments following a management change should be scheduled to enable evaluation of two fishing years under the new management measures providing an opportunity for the population to react to the corrective management action while creating management stability for at least two years.

Measures to Address Recreational Release Mortality

Seasonal closures, I support Sub-options B2 Spawning Area Closures.

Gear restrictions, I support Sub-options C1 and C2.

Outreach and Education, I support Sub-option D1. States are required to promote best striped bass handling and release practices by developing campaigns.

Recruitment Assumption for Rebuilding Calculation, I support Option B. Use a low recruitment assumption for the 2022 stock assessment.

Rebuilding Plan Framework, I support Option B. Enable ASMFC to respond quickly through Board action.

Management Program Equivalency, I support Sub-options B1-A and B1-C, C3, and D1.

Thank you for the opportunity for allowing me to share my thoughts on this important issue.

Sincerely,

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# VSSA Form Letter submitted by 73 individuals

From: [REDACTED]  
Sent: Thursday, March 31, 2022 7:48 PM  
To: [Comments](#)  
Subject: [External] Draft Amendment 7 - I support VSSA Position

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Categories: Auto Replied

The Virginia Saltwater Sportfishing Association was founded in 2015 and currently represents over 600 anglers and six fishing clubs in the Commonwealth of Virginia. According to Southwick Associates, the Striped Bass fishery provides a huge socio and economic value with over 100,000 jobs, generating close to \$8 billion annually. At one time, in the not-too-distant past, Striped Bass represented a huge success story in rebuilding a stock.

Unfortunately, since that previous rebuilding occurred, ASMFC's Striped Bass Management Board has been slow to react in maintaining this iconic fishery. Due to the previous inaction from the Striped Bass Management Board, VSSA believes immediate action is called for in rebuilding the Striped Bass population and supports the most conservation-oriented positions.

VSSA submits the following recommendations for The Striped Bass Management Boards consideration.

## MANAGEMENT TRIGGERS – Section 4.1

Tier 1 Fishing Mortality Triggers - VSSA strongly believes we should maintain the Status Quo on the existing Management Triggers. Accordingly, VSSA supports:

- Option A1: status quo - Reduce F to a level that is at or below the target within one
- Option B1: status quo – Same as Option A1 - Reduce F to a level that is at or below the target within one year
- Option C1: status quo - If F exceeds the F target for two consecutive years... the striped bass management program must be adjusted to reduce F to a level that is at or below the target within one year.

Tier 2-Female Spawning Stock Biomass (SSB) Management Triggers – implements a 2-year deadline to act and forces a 10-year rebuilding plan (no more kicking the can down the road).

- Option A2: VSSA supports a 2-year deadline to implement a rebuilding plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.
- Option B1: VSSA supports the status quo
- Option C1: VSSA supports the status quo

Tier 3-Recruitment Triggers – VSSA supports using trigger alternative with higher sensitivity.

- Option A2: The recruitment trigger more sensitive than the status quo but less sensitive than sub-option A3. This trigger alternative would have tripped three times since 2003: NY in 2006; MD in 2010; MD in 2014 (VSSA position revised 030822)
- Option B2: If the recruitment trigger is tripped...F target must be reduced within one year
- Tier 4- Deferred Management Actions. VSSA believes immediate action is required (no more kicking the can down the road).
- Option A: No deferred action if any or all of the triggers are tripped, the board is required to act.

RECREATIONAL RELEASE MORTALITY- Section 4.2.2 The Draft Amendment 7 Plan denotes number of fish that die after release is greater than the harvest. VSSA believes steps must be taken now to reduce mortality. Accordingly, VSSA supports both effort controls (seasonal closures) and gear restrictions.

- Option A: VSSA supports the status quo (circle hook measures)
- Option B1: limited support – State Specific Two-Week Closures. VSSA notes two weeks may or may not be enough. For example, VSSA believes the current two-week closure is woefully inadequate in Maryland during the warm summer months.
- Option B2: VSSA supports – Effort Closures in Spawning Area for both Recreational and Commercial Harvest. Additionally, VSSA strongly believes there should be additional restrictions placed on the commercial harvest of pre-spawn Striped Bass. We are not saying reduce the commercial quota. We advocate moving the harvest to non-pre-spawn months.
- Option C1: VSSA supports - Additional Gear Restrictions – permit only non-lethal devices for removing fish.
- Option C2: VSSA supports - Additional Gear Restrictions – any fish caught on any unapproved method must be returned to the water
- Option D1: VSSA supports – Outreach and Education – States are required to develop public education and outreach campaigns

REBUILDING PLAN – Section 4.4.1

- Option B: VSSA supports rebuilding the female SSB no later than 2029 using the low recruitment regime assumption and understands that may result in more restrictive management measures

4.4.2 Rebuilding Plan Framework

- Option B: VSSA supports permitting the Management Board to take action in response to 2022 benchmark assessment without having to go through an amendment or public comment period.

MANAGEMENT PROGRAM EQUIVALENCY – 4.6.2 aka Conservation Equivalency (CE). The current use of CE allows states too much flexibility in meeting ASMFC directives. In the last Management Action, the Board was faced with in excess of 40 CE proposals from the states with no penalties if the CE plans failed. VSSA strongly believes Conservation Equivalency should not be allowed or used when the fishery is overfished and overfishing is occurring. Not allowing CE was not one of the options presented. Accordingly, VSSA supports the following:

- Sub-Option B1a: VSSA supports no CE when the stock is at or below the biomass threshold.
- Sub-Option B1c: VSSA supports no CE when the fishing mortality is at or above the fishing mortality threshold.
- Sub-Option B2b: VSSA supports no Quota managed recreational fisheries (e.g., bonus programs)
- Sub-Option C3: VSSA supports Default Precision Standards for MRIP Estimates – 30%
- Sub-Option D2: VSSA supports Default CE uncertainty buffer non-quota managed fisheries – 25%. This option provides states with an incentive to design specific CE efforts to increase accuracy.
- Sub-Option E2: VSSA supports Percent reduction at the state-specific level.

As additional information, if CE is allowed, VSSA believes payback should be required in the following year for any state not meeting the objectives set in any approved CE proposal.

Public comment was not requested on section 5.6.1 Spawning Area Closures (Pg 89 of the PID) VSSA strongly endorses the prohibition of fishing on the spawning grounds during the spawning season. In addition to the mandatory spawning closures [if selected in Section 4.2.2; delete if not-selected], states are encouraged to maintain existing spawning closures and evaluate the need for additional spawning closures.

VSSA submits the following Comment on Section 5.6.1:

- VSSA firmly believes if any area is closed for any reason, neither recreational nor commercial fishing should be allowed in that area. If one sector (recreational or commercial) is not allowed to harvest during any period, neither sector should be allowed to harvest. Moreover, VSSA believes the Spawning areas should be closed pre spawn to both Recreational and Commercial harvest. We are not advocating Commercial quota be reduced; we advocate the harvest effort be shifted away from the pre spawning period.
- Amendment 7 will set the course for the future of this iconic fishery. VSSA urges the Striped Bass Management board to act with urgency and implement the measures necessary to rebuild this fishery. Thank you in advance for considering our position on the issues in Amendment 7.

Respectfully,

# MCBA Form Letter submitted by 27 charter captains

## ASMFC Amendment 7 Statement

The Maryland Charter Boat Association is the largest group of professional Captains on the Chesapeake Bay who promote sustainable sport fishing and local tourism. We are small business owners and family businesses that operate in your community.

Over the past two seasons we have continued to build our relationship with the State of Maryland and have participated in the FACTS reporting system as professional fishermen. The hope of our reporting is to assure fishery managers the accuracy of our data and that its punctuality occurs in real time.

In an act of preservation, in 2020 the State of Maryland acted to reduce harvest of Striped Bass by 18% and a total of 28% including Commercial harvest. Consequently, our industries season was shortened in a three phase effort help rejuvenate the Striped Bass population. In summary: 13 days of our Spring Fishery was eliminated, 16 days of our Summer Fishery was canceled, and the last 5 days of our Winter Fishery was closed. This effort that was once available to us as anglers can also be seen in Amendment 7's public comment on page 61 based on the 2019 data set. The alterations to the season will continue into 2022.

We are thankful for our partnership with fishery management staff within the Maryland Department of Natural Resources. This partnership has afforded us the opportunity to continue to fish within our current 6 month, 3 week Striped Bass Season.

Our concern, year in and year out is what is next? What will impact our businesses? Will we be able to operate in Maryland as an industry if proposed regulations continue to shorten our seasons and daily harvest limits?

We know as an industry that we have met the proposed Option B1-A effort controls proposed by ASMFC in Amendment 7. We feel that any other additional closure in the Chesapeake Bay for the For-Hire fleet is unnecessary due to our already abbreviated season. Our industries business model is reliant on a fishery that attempts to avoid unnecessary catch and release, or handling of Striped Bass. We are professional fisherman and utilize the best fishing practices and gear to avoid additional unnecessary discards during our trips. We feel that shifting to a one fish per angler limit for the for-hire fishery will not only result in unnecessary catch and release but will deter future customers from wanting to participate as anglers on our vessels.

Though our portion of the total Striped Bass harvest is minimal in comparison to the total data set, it should be the most accurate based on its parameters. To elaborate, as professional fishermen we have been asked over a two year period to log not only harvest data of all species through the FACTS Reporting System, but all releases, methods, and even bait caught. This comprehensive data set was recorded per trip and verified by random surveys by Maryland Department of Natural Resources employees. These employees were given our estimated check in time back at the dock with advanced notice during each trip. Our customers also took surveys after each trip when requested by state employees to verify our harvest data accuracy and their personal fishing history within the past season.

Not only have our Captains and Crew have been willing to better this fishery, our customers have devoted their time to it as well.

As Maryland Captains on the Chesapeake Bay we are the most concerned fisherman about the health of our fishery and the volatility of potential management decisions year after year. We feel that we have continued to sacrifice a large portion of our once open season, to accomplish fishery managers' goals. We feel that our For-Hire harvest data is as accurate and predictable as the commercial fishery. In comparison, we harvest roughly an estimated third of what the total commercial sector harvests annually (Number of fish Harvest by For Hire Charter Boats - Year 2018: 174,737, 2019: 167,203; 2020: 146,290, 2021: \*139,460 (\*as of end of November 2021) reports received April 6, 2021 & December 2021 from Public Information request). When comparing harvest records as an industry from 2018 vs 2021 's supplied data we have reduced our harvest by 25.3%.

As professional fishermen we strongly believe our release mortality rate is equivalent to or lower than the commercial fishery in Maryland. As professional fisherman we understand the correct way to handle and release fish. We are professional fisherman that hold the same credentials as all commercial fisherman, we all

are required to own a Tidal Fish License or a Guide's License to participate in our fishery. There is absolutely no logical reason why we as professional fisherman, are considered to have a higher release mortality than our colleagues in the commercial fishery. The unique ability to manage of our fishery and understanding the differences between the mortality of professional fishermen and recreational fishermen is a key principle that is only defined through Conservation Equivalency. The rationale that we are reliant on MRIP data estimates and not our own reporting harvest system creates even more division and opportunity for error in the Chesapeake Bay.

As professional fishermen we are well aware of the ever-changing dynamics of the Striped Bass Fishery on the Chesapeake Bay. We understand the regional differences and opinions that are proposed year after year. We understand the opinions of the recreational fishermen and commercial alike. We understand Maryland's uniqueness in the entirety of the Striped Bass fishery on the East Coast of the United States and support its opportunity to use conservation equivalency to manage its fishery.

We understand that personal observation of migration patterns through harvest data has changed, fishery biomass during seasons have changed with Chesapeake Bay health (as a result of depleted oxygen levels from algae blooms and pollution from multiple states), additionally predators have affected the fishery (including invasive species such as Blue Cat Fish & Snake Head, increasing observations of schools of Porpoise are natural predators and effect the location of the Striped Bass biomass in the Mid-Upper Chesapeake Bay during the Summer months, etc.), and climate change has affected the timing of the Spawning Stock Biomass, etc.

We also understand that with continued proposal of aggressive regulation it demands sacrifice as business owners. We have made the sacrifice already and continue to do so. We feel that our harvest data can be utilized to better the health of the bay and that our industry has been willing to make our best efforts to do so within reason. We feel that we are already operating within the required reduction of 15% directed trips that is proposed in Amendment 7 and the harvest data to be released in October will only support this effort made by our Captains.

We also know that the urgency and option to quickly push an objective through without public comment after October of this year is not in the interest of recreational, For-Hire, or Commercial fishermen. This should be a developed process that is given enough time to mature and allow for the participation of all parties of interest with the new data set in hand. The proposal to do so is unwise and a radical conclusion.

We support regional conservation efforts; we are stewards of Maryland's State Fish and sportsman alike. We support the betterment of the Chesapeake Bay's fishery and have done so historically through action and our recorded efforts. We understand the uniqueness of Maryland's fishery in comparison to the related Atlantic States and understand the importance of honoring conservation equivalency. We are fully vested business owners that are reliant on Maryland's State Fish in order to operate and are hopeful that our season will be restored through the principles of its current management strategy.

# Wild Oceans Form Letter submitted by 23 individuals

From: [REDACTED]  
Sent: Friday, April 15, 2022 8:41 PM  
To: [Comments](#)  
Subject: [External] Striped Bass Draft Amendment 7:  
WO

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Categories: Auto Replied

Dear Ms. Franke,

Dear ASMFC Atlantic Striped Bass Management Board,

Fishermen and fishing businesses up and down the coast - more than 100,000 jobs - depend on striped bass. Amendment 7 to the Atlantic Striped Bass Interstate Fishery Management Plan must focus on rebuilding the overfished stock and creating robust measures for maintaining healthy striped bass populations and sustainable fishing opportunities for the long term. The following options should be selected by the Management Board.

#### Management Triggers

The status quo fishing mortality triggers (Sub-options A1, B1 and C1) and spawning stock biomass (SSB) triggers (Sub-options B1 and C1) should be maintained. I strongly support a two-year deadline to implement a rebuilding plan (Female SSB Management Triggers Sub-option A2). With the exception of three relatively-strong year classes (2011, 2014 & 2015), striped bass recruitment has been below average and has contributed to stock declines. A new recruitment trigger is needed that is more responsive to the condition of the stock (Recruitment Trigger Sub-option A2 and Sub-option B2). When any of these management triggers are tripped, indicating the need for a management response, action should not be put off until the next stock assessment. (No Deferred Management Action Option A).

#### Addressing Recreational Release Mortality

Anglers should only use nonlethal devices to remove a striped bass from the water or to assist in releasing a striped bass (Sub-option C1). Striped bass caught on any unapproved method of take should be returned to the water immediately without unnecessary injury (Sub-option C2). States should continue to promote best handling and release practices by developing public education and outreach campaigns (Sub-option D2).

#### Rebuilding Plan

The rebuilding plan for striped bass must meet the 2029 deadline and use more realistic and current assumptions about recruitment (Recruitment Assumption for Rebuilding Calculation Option B). A mechanism that enables the Management Board to respond to the 2022 assessment update in a timely manner in order to keep the rebuilding plan on track is a prudent addition to the management plan (Rebuilding Plan Framework Option B).

#### Conservation Equivalency

Conservation Equivalency (CE), as currently applied to the management plan for

striped bass, allows states and jurisdictions to sidestep conservation measures necessary for ending overfishing and rebuilding the stock. When the female spawning stock biomass falls below the threshold or when the fishing mortality threshold is exceeded, conservation equivalency should not be granted for any state or jurisdiction (Sub-options B1-a and B1-c). Most importantly, CE proposals must not compromise conservation and management goals. Proposals should be designed to achieve the same level of reduction or liberalization that would have occurred in the state under the coast-wide measures. (Sub-option E2).

Thank you for taking my comments into consideration.

Sincerely,

██████████

██████████

████████████████████



# ASGA support Form Letter submitted by 18 individuals

From: [REDACTED]  
Sent: Monday, March 7, 2022 11:59 AM  
To: Comments  
Cc: [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
Subject: [External] Amendment 7

---

Categories: Auto Replied

I support the positions of the American Saltwater Guides Association.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

# CCA MD support Form Letter submitted by 8 individuals

From: [REDACTED]  
Sent: Friday, April 15, 2022 12:24 PM  
To: [Comments](#)  
Subject: [External] Draft Amendment 7 Input - CCA

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Categories: Auto Replied

I am with the CCA on this.

CCA's preferred options are:

## 4.1 Management Triggers

Tier 1: Fishing Mortality (F) Triggers Sub Options: A1, B1, C1

Tier 2: Female Spawning Stock Biomass (SSB) Management Triggers Sub-Options: A2, B1, C3

Tier 3: Recruitment Triggers – Sub Option: A2, B2

Tier 4: Deferred Management Action – Option: A, F

4.2.2 Measures to Address Recreational Release Mortality – Option: A, B2-a, D1

4.4.1 Recruitment Assumption for Rebuilding Calculation – Option: B

4.4.2 Rebuilding Plan Framework – Option: B

4.6.2 Management Program Equivalency – Option: B1-a, B1-c, C3, D1

Thank you,

[REDACTED]  
[REDACTED]  
[REDACTED]

# Form Letter 1 submitted by 141 individuals

From: [REDACTED]  
Sent: Friday, April 15, 2022 7:44 PM  
To: [Comments](#)  
Subject: [External] Comment for Draft Amendment 7

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Categories: Auto Replied

My name is [REDACTED] and I am an avid surfcaster from the state of Massachusetts. I've been surfcasting for 25 years. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2


Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

[REDACTED]  
[REDACTED]  
[REDACTED]

## Form Letter 2 submitted by 33 individuals

From:   
Sent: Wednesday, April 13, 2022 8:43 PM  
To: [Comments](#)  
Subject: [External] Re: Striped Bass Draft Amendment 7  
Comment

---

Categories: Auto Replied

April 13<sup>th</sup>, 2022

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

Dear Ms. Franke and members of the ASMFC Striped Bass Advisory Council,  
Striped Bass are a very important species to me and to the local economy as well. Our region has seen a major decline in size and diversity of year classes. My hope is that the species will be managed for abundance in the years ahead, for our generation and future generations.

Please find my comment on the Striped Bass Draft Amendment 7 below.

4.1 Management Triggers

Tier 1

- Sub-Option A1
- Sub-Option B1
- Sub-Option C1

Tier 2

- Sub-Option A2
- Sub-Option B1
- Sub-Option C1

Tier 3

- Sub-Option A2
- Sub-Option B2

Tier 4

- Option A

4.2.2 Measures to Address Recreational Release Mortality

Option C

- Sub-Option C1
- Sub Option C2

Option D

- Sub Option D2

4.4 Rebuilding Plan

4.4.1 Recruitment Assumption for Rebuilding Calculation

Option B

4.4.2 Rebuilding Plan Framework

Option B

4.6.2 Management Program Equivalency

Option B

- Sub-Option B1-a

Option C

- Sub-Option C3

Option D

- Sub-Option D2

Option E

- Sub-Option E2

Sincerely,



## Form Letter 3 submitted by 31 individuals

From: [\[REDACTED\]](#)  
Sent: Thursday, April 14, 2022 9:14 PM  
To: [Comments](#)  
Subject: [External] Striped Bass Amendment 7  
comments

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Categories: Auto Replied

To the ASMFC

My name is [REDACTED] from New York and I am responding to the request for public comments on Amendment Seven for the management of striped bass.

Here are my choices for each proposed regulation.

4.1  
Tier 1  
A1  
B1  
C1  
Tier 2  
A2  
B1  
C1  
Tier 3  
A2

B2  
Tier 4  
A  
4.2  
B- None  
C1, C2  
D2  
4.4.1  
B  
4.4.2  
B  
4.6.2  
B1-a  
C3  
D2  
E2

Please stand up for the striped bass, and end overfishing as quickly as possible. Please manage stripers for abundance, and not yield!

Thank you,

██████████

## Form Letter 4 submitted by 23 individuals

From: [REDACTED]  
Sent: Friday, March 25, 2022 7:50 AM  
To: [Comments](#)  
Subject: [External] Striped Bass Amendment 7  
comments

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Categories: Auto Replied

To the commission

I am commenting on the proposed striped bass Amendment 7.

My name is [REDACTED] and I am from the state of Massachusetts, I am an avid recreational shore fisherman who cares deeply for our striped bass fishery. Before I comment on the individual pieces of the proposed Amendment 7, I would like to make a few general comments and recommendations. I have put my specific comments to the individual questions/tiers related to Amendment 7 in a simple list at the end of this document, for ease of data collection by the administrative staff.

- The public information document for Amendment 7 was very complex and I believe it dissuaded public engagement. It was far too long, with too much jargon and unnecessary details. I know, for a fact, that this prevented people from engaging in the process, or submitting comments- it was too much time and effort to even read the document, let alone understand all the nuance and details, and then comment on all the choices. In the future, at minimum there should be some kind of summary document that is short enough for the average citizen to read in less than 15-minutes, which can be understood by everyone.

- The ASMFC has stated that the public is losing faith in their ability to make swift, critical decisions based on science and public input. Please, act fast and in accordance with science and the majority's wishes: do not delay or we will lose this fishery forever.

- This is a critical moment for the striped bass, and we all- including the commission- know it. Please, consider managing the striped bass for abundance and not for yield when making your decisions. Note that the striped bass fishery is almost entirely a recreational, catch and release, fishery, and that is where the largest portion of the GDP generated by the fishery comes from. The good news is, the more fish in the ocean, the better it is for everyone: the fish, the economy, and the citizen angler..

- In the past, the ASMFC has adopted measures with low statistical chances of being



successful, over very long timelines. I believe this is the wrong way to manage this fishery. We need better management and more aggressive measures that have a higher likelihood of protecting the fishery, and rebuilding and responding more quickly. I am in support of management that favors keeping “too many” fish in the ocean, and responding to low spawning years and increased effort on a year-by-year basis.

· I am in total opposition to any measure that would decrease the benchmarks the fishery is managed by. That is, we should not be lowering or shifting baselines. We have managed the population well in the past, and should never consider decreasing our population targets (SSB thresholds and triggers). A sliding baseline is unacceptable and will be the demise of this fishery!

· While I would be in favor of closing spawning areas to both harvest and targeting of striped bass, there is no scientific evidence it would lead to any appreciable increase in the size of the population (SSB or YOY). If the commission can prove it would, I would absolutely be in favor of this measure- and even longer periods of closed fishing, if that would help even more. However, I fear some states will ultimately fight so hard against this measure, that they will not be willing to accept other, more important parts of this amendment. That, and law enforcement has deemed this measure unenforceable. For this reason, at this time, I do not support 4.2, tier B. However, I would be in support of closures if these concerns could be addressed, and would even support stricter and/or longer closures if it ultimately leads to abundance.

Above all else, I ask that the ASMFC act quickly, decisively, and with abundance- not yield- at the forefront of their striped bass management decisions. We must rebuild this fishery in less than 10-years, and at all costs, and that requires immediate and aggressive action from the commission.

Thank you for the opportunity to comment, and hope that my voice will be heard, and we can save this important and beloved fishery.

4.1

Tier 1

Option A- Support A1

Option B- Support B1

Option C- Support C1

Tier 2

Option A- Support A2

Option B- Support B1

Option C- Support C1

Tier 3

Option A- Support A3

Option B- Support B2

Tier 4

Support A

4.2

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D1

4.4.1

Support B

4.4.2

Support B

4.6.2

Option B- Support B1-a

Option C- Support C3

Option D- Support D3

Option E- Support E3

Sincerely

████████████████████

██

## Form Letter 5 submitted by 9 individuals

From: [REDACTED]  
Sent: Friday, April 15, 2022 3:49 AM  
To: [Comments](#)  
Subject: [External] I support better regulations in Amendment 7 - Michael seith

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Categories: Auto Replied

My name is [REDACTED]

I am from New York, Striped Bass are important to me because recreational fishing is my passion. My family and friends all love fishing and we spend a lot of time and money chasing striped bass. A healthy Striped bass population is important to everyone, it is apparent that the bass are being overfished and on the decline. There needs to be improvements in the regulations or else they will be wiped out AGAIN.

I support

4.1

Tier 1

Option A- Support A1

Option B- Support B1

Option C- Support C1

# Form Letter 6 submitted by 9 individuals

From: [REDACTED]  
Sent: Wednesday, April 13, 2022 1:30 PM  
To: Comments  
Cc: [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
Subject: [External] Amendment 7 [Comments](#)

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Categories: Auto Replied

Dear ASMFC:

## 4.1 Management Triggers

### Tier 1: Fishing Mortality (F) Triggers

#### Option A: Timeline to Reduce F to the Target

I Support Sub-option A1 (status quo): Reduce F to a level that is at or below the target within one year.

#### Option B: F Threshold Triggers

I Support Sub-option B1 (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

#### Option C: F Target Triggers

I Support Sub-option C1 (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

### Tier 2: Spawning Stock Biomass (SSB) Triggers

#### Option A: Deadline to Implement a Rebuilding Plan

I Support Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan.

The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

#### Option B: SSB Threshold Trigger

I Support Sub-option B1 (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

#### Option C: SSB Target Trigger

I Support Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

### Tier 3: Recruitment Triggers

#### Option A: Recruitment Trigger Definition

I Support Sub-option A2: The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)11 shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

#### Option B: Management Response to Recruitment Trigger

I Support Sub-option B2. If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the

terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

#### Tier 4: Deferred Management Action

I Support Option A (status quo): No Deferred Management Action.

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

#### 4.2.2 Measures to Address Recreational Release Mortality

##### Option C. Additional Gear Restrictions

I Support Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

I Support Sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

##### Option D. Outreach and Education

I Support Sub-option D2: It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

#### 4.4 Rebuilding Plan

##### 4.4.1 Recruitment Assumption for Rebuilding Calculation

I Support Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

##### 4.4.2 Rebuilding Plan Framework

I Support Option B: 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 recruitment assumption specified in Amendment 7) 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.

#### 4.6.2 Management Program Equivalency (Conservation Equivalency)

##### Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status

I Support Sub-option B1-a: CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

##### Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals

I Support Sub-option C3: CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

##### Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries

I Support Sub-option D2: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

##### Option E. Definition of Equivalency for CE Proposals with Non-Quota

Managed Fisheries

I Support Sub-option E2: the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Thank you,



# Form Letter 7 submitted by 8 individuals

From: [REDACTED]  
Sent: Saturday, March 19, 2022 11:54 AM  
To: Comments  
Cc: [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
Subject: [External] Draft Amendment 7

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Categories: Auto Replied

I would like to comment on the Public Information Document Amendment 7 for striped bass. I ask that my opinion on the following options/sub-options be recorded:

## 4.1 MANAGEMENT TRIGGERS

### TIER 1: FISHING MORTALITY (F) TRIGGERS

OPTION A: I support Sub-Option A1

OPTION B: I support Sub-Option B1

OPTION C: I support Sub-Option C1

### TIER 2: SPAWNING STOCK (SBB) BIOMASS TRIGGERS

OPTION A: I support Sub-Option A2

OPTION B: I support Sub-Option B1

OPTION C: I support Sub-Option C1

### TIER 3: RECRUITMENT TRIGGERS

OPTION A: I support Sub-Option A2

OPTION B: I support Sub-Option B2

### TIER 4: DEFERRED MANAGEMENT PLAN

OPTION A: I support Option A

## 4.2.2 MEASURES TO ADDRESS RECREATIONAL RELEASE MORTALITY

### OPTION C. ADDITIONAL GEAR RESTRICTIONS

OPTION C: I support Sub-Option C1

OPTION C: I support Sub-Option C2

### OPTION D. OUTREACH & EDUCATION

OPTION D: I support Sub-Option D2

## 4.4 REBUILDING PLAN

#### 4.4.1 RECRUITMENT ASSUMPTION FOR REBUILDING CALCULATION

OPTION B: I support Option B

#### 4.4.2 REBUILDING PLAN FRAMEWORK

OPTION B: I support Option B

#### 4.6.2 MANAGEMENT PROGRAM EQUIVALENCY

OPTION B: RESTRICT USE OF CONSERVATION EQUIVALENCY ...

OPTION B: I support Option B1-a

OPTION C: PRECISION STANDARDS FOR MRIP ESTIMATES ...

OPTION C: I support Option C3

OPTION D: CE UNCERTAINTY BUFFER ...

OPTION D: I support Option D2

OPTION E: DEFINITION OF EQUIVALENCY FORCE PROPOSALS ...

OPTION E: I support Option E2

Thank you for the opportunity to register my thoughts,

██████████  
██████████



## Form Letter 8 submitted by 8 individuals

From: [REDACTED]  
Sent: Thursday, April 7, 2022 6:24 PM  
To: [Comments](#)  
Subject: [External] Amendment 7

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Categories: Auto Replied

I agree with the stance of the American Saltwater Guide Association. Striped bass should be managed for abundance rather than commercial yield. The fish is worth far more to coastal economies as a recreational species than as a commercially exploited one. We should be focused on rebuilding the stock. My stance aligns with the ASGA and can be read at the link below. <https://saltwaterguidesassociation.com/sgas-positions-on-striped-bass-amendment-7-a-comprehensive-guide/>

# Form Letter 9 submitted by 8 individuals

From: [\[REDACTED\]](#)  
Sent: Thursday, April 14, 2022 11:22 AM  
To: [Comments](#)  
Subject: [External] "Draft Amendment 7"

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Categories: Auto Replied

Hi,

My name is [REDACTED] and I am a very avid saltwater angler that spends countless hours fishing states in the northeast and mid Atlantic region. I am excited about Amendment 7 because it's no mystery that our striped bass fishery is in trouble and immediate action must be taken. Here are the options that I feel will help us rebuild this incredible fishery so that the public can enjoy what it has to offer for years to come.

On 4.1 Management Triggers, I support:

- Tier 1:  
options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality
- Tier 2:  
options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold
- Tier 3:  
options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions
- Tier 4:  
option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, I support:

- Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method
- Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

#### On 4.4.1 Recruitment

Assumptions for Rebuilding Calculation, I support:

- Option B  
to use the more realistic and conservative low recruitment regime assumptions  
to rebuild female SSB target levels no later than 2029. I recognize this option  
may require more restrictive management measures than option A, which I support

#### On 4.4.2 Rebuilding

Plan Framework, I support:

- Option B  
to allow the Board to take direct management actions as well as require public  
input, if the upcoming 2022 striped bass stock assessment update shows a less  
than 50% probability of rebuilding the stock by 2029

#### On 4.6.2 Management

Program Equivalency, per the Draft Amendment 7, “Management program equivalency

(also known as “conservation equivalency” or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

I believe in restricting

the use of conservation equivalency (CE) based on stock status. Specifically, I support:

- Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level
- Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates
- Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries
- Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

I really appreciate the opportunity as a saltwater fly fisherman to make these comments, and thank you all for your time. I will be very closely monitoring the outcome here and tracking all future progress of striped bass management.

Thank you,

██████████

Sent from [Mail](#) for Windows

## Form Letter 10 submitted by 8 individuals from Maine

From: [REDACTED]  
Sent: Thursday, April 7, 2022 11:37 AM  
To: Comments  
Cc: [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
Subject: [External] "Draft Amendment 7"

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Categories: Auto Replied

Hello,

My name is [REDACTED] and I am an avid recreational fly/spin angler fishing out of Yarmouth, ME in Casco Bay. I have three young sons and my only hope is that they, like me can enjoy growing up around this amazing fishery! I believe that if the following changes/adjustments aren't made that my children being able to target this amazing species for years to come may not be possible.

- Conservation Equivalency (CE) has been the most misused management tool in this fishery. It allows states to enact different regulations with the goal of achieving equivalent mortality reductions or increases. There's no accountability for states using CE's: the data limitations often can't support the use of CE's; and the track record for many CE's is appalling. [Sec. 4.6] We need the following guardrails:
  - No CE's permitted when striped bass are overfished.
  - Data used in CE proposals must meet the federal standard of 30 Percent Standard Error or less.
  - We need a 25% Uncertainty Buffer (front-end margin of error) built into any CE.
  - Equivalency for CE proposals must meet the state-specific level.
- We can't afford to weaken any existing Management Triggers nor delay implementation of action as the result of a Trigger. Allowing Deferred Management Action would be a setback. [Sec. 4.1]
- We need the most conservative recruitment triggers and fastest timeline for any required rebuilding plan. [Sec. 4.1]
- Seasonal Closures, as outlined in this draft, are not a reliable way to reduce striper mortality. Any new steps must be science-based, quantifiable, and enforceable. [Sec. 4.2]
- We must use the more recent, more conservative spawning success measures in calculations known as Low Recruitment Assumption. [Sec. 4.4]

Thank you for taking my comments into account and as an angler I appreciate your willingness to hear my opinion! I will be tracking the final decisions on this issue and hope that my and other anglers comments are strongly considered,

Best,

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

# Form Letter 11 submitted by 7 individuals from Connecticut

From: [REDACTED]  
Sent: Thursday, March 24, 2022 12:10 PM  
To: [Comments](#)  
Cc: [Ray](#)  
Subject: [External] Draft Amendment 7

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Categories: Auto Replied

To ASMFC,

My name is [REDACTED], and I'm a recreational fisherman from Connecticut. I'm concerned about the future of the striped bass fishery and would like to see it remain intact for my daughter and grandchildren to enjoy as I have. I favor the following options for Draft Amendment 7:

Tier 1

Option A: Sub-option A-1  
Option B: Sub-option B-1  
Option C: Sub-option C1

Tier 2:

Option A: Sub-option A2  
Option B: Sub-option B1  
Option C: Sub-option C1

Tier3:

Option A : Sub-option A2  
Option B: Sub-option B2

Tier 4:

Option B: Sub-option B1-a  
Option C: Sub-option C3  
Option D: Sub-option D2  
Option E: Sub-option E2

Thank you for the opportunity to contribute,

[REDACTED]  
[REDACTED]  
[REDACTED]

# Form Letter 12 submitted by 7 individuals from New Jersey

From: [REDACTED]  
Sent: Friday, February 18, 2022 12:48 PM  
To: [Comments](#)  
Subject: [External] Draft Ammendment 7

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As a recreational fishermen in NJ, I see first hand that the Striped Bass Fishery is in great shape. They are practically caught at will during the spring and fall seasons and in certain areas of our state, they are caught all through the summer. I also think the measures that were imposed two years ago have met the needed reductions and that the 2022 bench stock assessment will likely show this.

While I would support further and more restrictive measures if they were needed, that is not the case in NJ. I do understand that there are issues in the Chesapeake Bay area stocks so I would suggest focusing further conservation measures there.

[REDACTED]  
[REDACTED]  
[REDACTED]



# Form Letter 13 submitted by 6 individuals

From: [REDACTED]  
Sent: Tuesday, April 12, 2022 9:06 PM  
To: [Comments](#)  
Subject: [External] ASMFC comment letters

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April 10, 2022

Emilie Franke  
Fishery Management Plan Coordinator  
Atlantic States Marine Fisheries Commission  
1050 North Highland Street  
Suite 200A-N Arlington, Virginia 22201  
[comments@asmfc.org](mailto:comments@asmfc.org) (subject line: Striped Bass PID)

Subject: Striped Bass PID/ Amendment 7

Dear Ms. Franke,

The purpose of this letter is to provide public comment regarding Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass. Below I will present the options that I would prefer be selected by the Board when Amendment is finalized and promulgated.

I have been fishing recreationally for striped bass from 2005 to the present and have seen the abundance of fish rise and fall drastically over that time period. As you are aware, by now the evidence is clear that the fishery needs help. We've seen a precipitous decline in abundance for about 15 years and need to turn things around.

By that virtue, this Amendment should do all it can to bring the fish back to prosperity, and as quickly as possible. Many of the options presented in the Public Information Document would allow the Commission to delay action more than the current Amendment. The following are my selected options from the Public Information Document:

#### Tier 1 – Timeline to Reduce F to Target

I select Sub Option A1, which is status quo from Amendment 6, and requires a reduction of F to target level or below within one year. It would seem backwards, given the declining state of the fishery to create a rule that could delay action.

I select Sub Option B1, which is status quo from Amendment 6, and keeps the Threshold Trigger at 1-year for F exceedance for management actions to be considered. Other options would allow for delayed management actions. And again, given the declining state of the fishery to create a rule that could delay action.

I select Sub Option C1, which allows for quicker management actions to be taken when faced with F exceedance. By choosing any of the other options, we could be faced with a situation where the fishery continues to get abused for multiple years before action is taken. This would require future actions to be more painful to user groups than they need to be.

#### Tier 2 – SSB Triggers

I select Sub Option A2, which requires the Commission to issue a rebuilding plan within two years if a SSB trigger is tripped. Other options would potentially delay recovery actions. Sadly, this is the hole that the Commission dug for itself in allowing the abundance of striped bass to the point it has, over the past decade and a half.

I select Sub Option B1, which is a status quo option that keeps the SSB Trigger set at “if the SSB drops below the threshold, the management plan must be adjusted within an established time-frame”. Delaying action has proven to be a problem with management of Striped Bass, particularly given political involvement in the process. I select Sub Option C1, which states that trigger for SSB Target would be 2 years of falling below the target to require management action. Once again, the other sub options seek to allow more time to pass for the managers to take action, which is counterintuitive to me.

### Tier 3 – Recruitment Triggers

I select Sub Option A2, as it seems to be the most reasonable option. This allows for the trigger to be placed at a meaningful level, so as to enable the managers to take corrective actions, in the event that the fishery suffers poor recruitment, while the fishery is in an overfished state.

I select Sub Option B2, as I believe that it allows for a properly conservative response to low-recruitment data. In the event that the fishery shows sufficient improvement, over time, I could support an addendum that would relax a bit (such as described in the other Sub Options).

### Tier 4 – Deferred Management Action

I select Option A. With declining striped bass abundance over the past 15 years, we can't be allowing for options that would defer action. The time for that has passed.

The need for Amendment 7 should be proof of it.

### Recreational Management Measures

I select Option B2-a, which would mean no harvest of bass in spawning areas from January through April. This would have a great effect on the fishery, while not a burden to fishermen, who, in my experience, get more enjoyment from catching the fish than eating them.

I select Sub Option C-1, which would outlaw the use of gaffs on Striped Bass.

I have no comment on Option C-2, as I feel the use of circle hooks is difficult to enforce, and that, in some sense, the ASMFC has to manage the striped bass to account for and accept a certain degree of recreational mortality. As a responsible fisherman who almost never gut hooks fish, I want the freedom to fish with the hooks that I want to use.

I select Option D2, which recommends to states to do outreach and education on proper fishing and handling of fish practices. I think it too burdensome to “require” states to do such programs and also will cost them financially.

### Rebuilding Plan

I select Option B because by using an assumed low recruitment regime, we can offset issues where F is not accurately being identified.

### Rebuilding Plan Framework

I select Option B because it allows for quicker action by the commission in the event that the 2022 stock assessment results show that this is needed.

### Management Program Equivalency

I select Option B1-a, as I believe this makes the most sense. When the fishery is at or below the biomass threshold, states should not be allowed to toy around with their regulations. As history has proven, this is risky business.

I select Option C. MRIP data should not be usable in coming up with Conservation Equivalencies, in cases where the Standard Error is above 30%.

I select Option D2. It is practical and “careful” to require a 25% uncertainty buffer in proposals for CE.

Sincerely,

[REDACTED]  
[REDACTED]  
[REDACTED]

# Form Letter 14 submitted by 6 individuals

From: [REDACTED]  
Sent: Tuesday, April 12, 2022 10:04 PM  
To: Comments  
Subject: [External] Draft Amendment 7

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Hi,

My name is [REDACTED] and I am a recreational fisherman from New York City. I fish the local waters to me around New York City and Long Island. Striped Bass are an important fish to me and these options I chose below I believe will be best for the fishery going forward.

I endorse the following Draft Amendment 7 options:

## 4.1 Management Triggers

Tier 1 Options: Fishing Mortality (F) Management Triggers

- Option A2
- Option B2
- Option C3

Tier 2 Options: Female Spawning Stock Biomass (SSB) Management Triggers

- Option A1
- Option B2
- Option C2

Tier 3 Options: Recruitment Triggers

- Option A1
- Option B1

Tier 4 Options: Deferred Management Action

- Option F

#### 4.2.2 Measures to Address Recreational Release Mortality

- Option A
- Option D2

#### 4.4.1 Recruitment Assumption for Rebuilding Calculation

- Option A

#### 4.4.2 Rebuilding Plan Framework

- Option A

#### 4.6.2 Management Program Equivalency

- Option A

Thanks for your consideration in this matter.

Sincerely,

██████████

Sent from my iPhone

## Form Letter 15 submitted by 5 individuals

From: [REDACTED]  
Sent: Friday, April 8, 2022 4:09 PM  
To: [Comments](#)  
Subject: [External] amendment 7

---

Categories: Auto Replied

Dear ASMFC Commissioners,

As a recreational saltwater angler, I thank the ASMFC for the opportunity to provide input on regulations pertaining to striped bass. I am concerned that both your data and the experiences of anglers all along the coast are finding a steep decline in striper populations. This is having a substantial negative impact on anglers as well as the economies of our coastal communities this formerly prized fishery supported. As the group responsible for fish management, I urge the ASMFC to be much more conservative in your regulations and take immediate actions to rebuild the stock. In addition, restricting the use of conservation equivalency is essential to avoid some states from using this as a loophole to avoid regulations. I have listed below my support for options related to Amendment 7:

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, I believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically,

- Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level
- Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates
- Option D3, which would require an uncertainty buffer of 50% for proposed CE programs for non-quota-managed fisheries
- Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

On 4.1 Management Triggers,

- Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality
- Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold

- Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions
- Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

#### 4.2 Recreational Fishery Management Measures

- Option B Seasonal Closures:
- -Sub-option B2-b. No-Targeting Spawning Closure Required: All recreational targeting of striped bass would be prohibited for a minimum two-week period on all spawning grounds (not necessarily the entire spawning area) during Wave 2 (March-April) or Wave 3 (May-June), as determined by states to align with peak spawning. States will determine the boundaries of spawning ground closures. Closures prohibiting recreational targeting on spawning grounds have already been implemented in Maine (Kennebec River), New Jersey (Delaware River), and Maryland (Chesapeake Bay) during part of Wave 2 and/or Wave 3.

#### On 4.2.2 Measures to Address Recreational Release Mortality,

- Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method
- Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

#### On 4.4.1 Recruitment Assumptions for Rebuilding Calculation,

- Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. I recognize this option may require more restrictive management measures than option A, which I support

#### On 4.4.2 Rebuilding Plan Framework,

- Option B to allow the Board to take direct management actions as Ill as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

Sincerely,

██████████

# Form Letter 16 submitted by 5 individuals

From: [REDACTED]  
Sent: Sunday, March 20, 2022 9:46 PM  
To: [Comments](#)  
Subject: [External] Draft amendment 7 response

---

Categories: Auto Replied

Dear ASMFC members.

My name is [REDACTED] and I'm a recreational catch and release angler who's fished back in the 1980's seen the collapse and then the rebuild. It is time that the board really moves forward at an expedited pace so we don't see that collapse again. I am on the water 4-5 nights a week during the striper season I have fished from New Jersey to Maine in the last 5 or so years and We all need to do our part. Below you will find what I would like to see for Amendment 7  
Thank you for your time and efforts

## 4.1 Management triggers:

Tier 1 Options: Fishing Mortality (F) Management triggers

Sub-option A1

Sub-option B1

Sub-option C1

Tier 2 Options: Female Spawning Stock Biomass (SSB) Management triggers

Sub-options A2

Sub-option B1

Sub-option C1

Tier 3 Options: Recruitment Triggers

Sub-option A2

Sub-option B2

Tier 4 Options: Deferred Management Actions

Option A

4.2.2 Measures to Address Recreational Release Mortality

Option A

Sub-option B2-a

Sub-option C1

Sub-option C2

Sub-option D1

4.3.2.1 Commercial Quota Transfers

Maintain no transfer of quotas



4.4.1 Recruitment Assumption for Rebuilding Calculation  
Option B

4.4.2 Rebuilding Plan Framework  
Option B

4.6.2 Management Program Equivalency  
Sub-option B1-a  
Sub-option C3  
Sub-option D2  
Sub-option E2

Thank you again

██████████

Recreational angler  
Catch and release only

Sent from my iPhone

## Form Letter 17 submitted by 5 individuals

### Amendment 7 Striped Bass

Thank You for taking the time to listen to comments from the public and individuals like myself. However, I must say that the document and options created are so complex as to make it nearly impossible for the public to comment on. I do want to applaud you for taking the steps to add the recruitment triggers and restrictions to Conservation Equivalency. As someone fortunate to have grown up fishing the “good years” of the early 90’s it was clear by the early 2010’s that a serious problem was afoot. Many of us then became quite vocal and have since asked that meaningful action had to be taken. Again, we stated as much after the 2018 benchmark stock assessment but instead of the most conservative action you “kicked the can” and here we are today. We’ve allowed conservation equivalence to be abused by Maryland that wiped out our savior 2011-year class with no penalty and NJ to just laugh at the process year after year and we’re about to watch the 2015-year class meet the same fate. MD and NJ were responsible for 73% of total recreational harvest and many of these fish are below 28”, the minimum size to have spawned at least once.

We now have the ASMFC weaponizing the release mortality by recreational fisherman that release 90% of their striped bass caught, regardless of the size, to help rebuild the fishery. That means 91% survived to spawn and fight another day. I would argue that if each recreational angler kept every fish allotted, you’d have to shut fishery down April 16<sup>th</sup>.

It is estimated that the recreational striped bass fishery is worth \$7.7 Billion and supports 105K jobs. As a restaurant owner on eastern long island with over 50 employees the economic benefit of a healthy fishery is obvious. It is better to feel a little pain now to rebuild the stock to the required SSB then to continue to “kick the can” and manage the fishery to a lower abundance level and severe pain and loss of income in the future.

Here are the options I choose:

Tier 1: Fishing Mortality Triggers  
Sub Option A1

Threshold Triggers:  
Sub Option B1

Target Triggers:  
Sub Option C1

Tier 2:SSB Triggers  
Sub Option A2

SSB Threshold Trigger:  
Sub Option B1

SSB Target Trigger:  
Sub Option C1

Recruitment Trigger:  
Sub Option A2

Management Responses to Recruitment Trigger:  
Sub Option B2

Tier 4: Deferred Management Action  
Option A – NO DEFFERMENT!

Recreational Release Mortality:  
Sub Option B2 – Seasonal Closures  
Sub Option C1  
Sub Option C2

Outreach and Education:  
Sub Option D2

Recruitment Assumption for Rebuilding Calculation:  
Option B

Rebuilding Plan Framework:  
Option B

Management Plan Equivalency:

Sub Option B1-A

Sub Option C3

Sub Option D2

Sub Option E2

Now we'll wait for the 2022 Striped Bass Stock Assessment and make changes again.

Thank You for your time.

Sincerely,

████████████████████



OFFICE OF THE ATTORNEY GENERAL  
CONNECTICUT

April 14, 2022

WILLIAM TONG  
ATTORNEY GENERAL

**By Email**

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

Re: *Adoption of Amendment 7 of Interstate Fishery Management Plan for Striped Bass*

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board (the “Board”):

On behalf of conservation-minded anglers, the Attorneys General of **Connecticut, Massachusetts and Rhode Island** urge you to take meaningful and decisive action, through the adoption of Amendment 7 to the Interstate Fishery Management Plan for Striped Bass (Amendment 7), to reform the ASMFC’s striped bass management program in order to restore and sustain the striped bass population for generations to come.

Striped bass are arguably the most important recreational marine fish species, both in the Northeast and in the United States, and form the economic backbone of the recreational fishing industry from Maine to Virginia. In Connecticut alone, anglers have averaged almost four million trips targeting striped bass annually over the past 10 years. With the striped bass vulnerable to many varied hazards, including those from climate change, it is critical that everything be done to maintain an abundant fish population. “Striped bass exhibit a number of characteristics identified by NOAA (National Oceanic and Atmospheric Administration) as increasing their vulnerability to climate change effects, including complexity of reproductive strategy, short duration aggregate spawning, sensitivity to temperature, prey-specificity, and specific larval requirements.”<sup>1</sup> “In Chesapeake Bay, the volume of suitable juvenile and adult striped bass summer habitat has contracted as the volume of hypoxic water has increased. Expansive hypoxia coupled with warming water temperatures due to climate change will further reduce future summer habitat available to striped bass.”<sup>2</sup> The drop of the striped bass population has impacted small businesses that rely on fishing resulting in a 40% drop in fishing trips since 2006.<sup>3</sup> Ensuring that this species continues to

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<sup>1</sup> ASMFC, February 2022, Draft Amendment 7, page 6 citing to Morrison WE, Nelson MW, Howard JF, Teeters EJ, Hare JA, Griffis RB, Scott JD, and Alexander MA. 2015. Methodology for Assessing the Vulnerability of Marine Fish and Shellfish Species to a Changing Climate. NOAA Technical Memorandum. U.S. Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service

<sup>2</sup> ASMFC, February 2022, Draft Amendment 7, pages 18-19 citing to Cimino, J., M. Fabrizio, K. Culzoni, D. Gauthier, J. Jacobs, M. Johnson, E. Martino, N. Meserve, S. Minkinen, D. Secor, A. Sharov, J. Uphoff, W. Vogelbein, J. Gartland, R. Klauda, R. LaTour, and M. Topolski. 2009. Ecosystem-based fisheries management for Chesapeake Bay: Striped bass background and issue briefs (Publication Number UM,SG,TS,2009,07). Maryland Sea Grant. <https://www.mdsg.umd.edu/sites/default/files/2019-12/EBFM-Striped-Bass-Briefs-1.pdf> and Coutant, C. C. 1990. Temperature–oxygen habitat for freshwater and coastal striped bass in a changing climate. Transactions of the American Fisheries Society 119:240–253

<sup>3</sup> NOAA Fisheries Service, MRIP Effort Directed Trip

165 Capitol Avenue  
Hartford, Connecticut 06106

Emilie Franke. ASMFC

April 14, 2022

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provide widespread opportunities for anglers, regardless of their fishing method, location, or attitudes about harvest, it is predicated on employing a precautionary approach to management that puts the resource first.

ASMFC's success in rebuilding the collapsed striped bass stock in the 1980s and 1990s was widely heralded as a conservation success story that demonstrated the effectiveness of strong, forward-thinking management measures. However, a series of missteps by the Board over the past decade led to a steady decline, with the species declared overfished in 2019.<sup>4</sup> With spawning stock biomass currently at a twenty-five year low, managers are at a critical inflection point that could determine the species' fate for decades to come.

Amendment 7 represents a singular opportunity to improve ASMFC's striped bass management program. At the same time, the draft amendment includes potential pitfalls, particularly on the issue of management triggers, that could undermine efforts to keep the resource healthy. Our top priorities for each of the issues included in the draft amendment are outlined below.

#### *Management Triggers (4.1)*

The fishing mortality and spawning stock biomass triggers contained within Amendment 6 to the Interstate Fishery Management Plan for Striped Bass<sup>5</sup> require the Board to act quickly at the first indication that a threat to the stock has arisen. Draft Amendment 7 includes options to relax some of these triggers, so that the Board could delay its response; supporters of such options cite concerns about data precision, accuracy, and interannual variability, particularly concerning recreational catch and harvest estimates. While such concerns are not unwarranted, they do not preclude the need to be risk-averse in protecting the fishery by adjusting management measures as soon as the need arises. In recent years, the public has made its preference overwhelmingly clear: ASMFC must be nimble and responsive to troubling indicators in the fishery. Relaxing mortality and biomass management triggers would have a negative impact not only on the Board's ability to ensure stock health but on the public's faith in its ability to do so. As a result, we largely support status quo for mortality and biomass triggers, and oppose granting the Board the option of deferring necessary management action.

However, we support Tier 2, sub-option A2, which requires the Board to implement a rebuilding plan within two years of the stock's being declared overfished. It has been nearly three years since the striped bass stock was declared overfished, but the Board has yet to approve or even initiate a rebuilding plan, despite the Management Plan's injunction to rebuild the female spawning stock biomass to the target within ten years. Approval of this sub-option would compel the Board to act quickly, paralleling federal requirements under the Magnuson-Stevens Fishery Conservation and Management Act and further demonstrating to the public the Board's commitment to recover the fishery.

The recruitment trigger options contained in the draft amendment represent another significant improvement to the management program. The current recruitment trigger is insufficiently sensitive and has failed to identify periods of poor recruitment that have occurred over the past two decades. Furthermore, even if such trigger had been tripped, it does not require Board action when low recruitment threatens the health of the stock. We strongly support either of the two options that would increase the sensitivity of the recruitment trigger, as well as Tier 3, sub-option B2, which would require the Board to make adjustments to fishing mortality when the recruitment trigger is tripped.

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<sup>4</sup> ASMFC. May 2019. Stock Assessment Overview: Atlantic Striped Bass.

<http://www.asmfc.org/uploads/file/5cc9ba4eAtStripedBassStockAssessmentOverview.pdf>.

<sup>5</sup> Atlantic States Marine Fisheries Commission. 2003. Amendment 6 to the Interstate Fishery Management Plan for Atlantic Striped Bass. <http://www.asmfc.org/uploads/file/sbAmendment6.pdf>.

Emilie Franke. ASMFC

April 14, 2022

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*Rebuilding Plan (4.4.1)*

As became evident in the public's response to the Amendment 7 Public Information Document scoping process last year, stakeholders want ASMFC to take decisive action to rebuild the striped bass stock. We are encouraged by the draft amendment's consideration of a rebuilding plan that will fulfill its obligation to rebuild spawning stock biomass to its target by 2029. In developing such a rebuilding plan, the Board must recognize the poor recruitment that striped bass have experienced in recent years. Consider Maryland's juvenile abundance index in upper Chesapeake Bay, where the past three years have produced some of the smallest year classes on record.<sup>6</sup> Assuming continued poor spawning success when developing the rebuilding plan, Option B of section 4.4.1 would better ensure the success of such a plan. While Option B may necessitate stricter regulations in the short-term, it will position the stock—and those who rely on it—for long-term success.

In the same vein, while robust opportunities for public participation are an essential element of the striped bass management program, the Board's past failures to act have only increased the urgency to initiate a rebuilding plan that is positioned for success. As a result, we support Option B for Section 4.4.2, which allows the Board to take quick action should the 2022 stock assessment update, to be released this coming fall, demonstrate that current measures are insufficient to recover the stock by the 2029 deadline.

*Management Program Equivalency (4.6.2)*

Perhaps the most critical component of this draft amendment is its suite of proposals to rein in abuse of Management Program Equivalency, also known as Conservation Equivalency (CE). As an advocate for the residents of our states, we support such proposals, which are intended to stem some states' systematic abuse of the CE process, which effectively shifts the conservation burden from such states onto the shoulders of anglers in our states and other, more conservation-oriented jurisdictions.

Thus, we strongly support sub-option B1-a, which would prohibit the use of CE when the stock is overfished. Because state recreational fishery data is substantially less precise than data collected at a coastwide level, we also support sub-option C3, which establishes a minimum level of precision for recreational catch data used in CE proposals, and sub-option D2, which creates a buffer to account for the greater uncertainty inherent in state-level data.

In addition, we support sub-option E2, which requires that state CE proposals achieve the same quantified level of conservation in the relevant state as the standard management measures adopted by the Board. In doing so, we note that the alternative, sub-option E1, fails to comply with the Interstate Fishery Management Program Charter's requirement for CE programs, that such programs "achieve the same quantified level of conservation *for the resource under management*."<sup>7</sup> As Draft Amendment 7 itself notes, sub-option E1 may provide a lesser level of conservation for the striped bass resource, and so undercut the success of management measures.

The striped bass is the flagship species of ASMFC, and public confidence in the Board's ability to manage striped bass sustainably is at an all-time low. Now is the time to take the actions needed to ensure that the public will enjoy a thriving striped bass resource, and a vibrant and economically valuable striped bass fishery, for generations to come.

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<sup>6</sup> Maryland Department of Natural Resources. October 15, 2021. Chesapeake Bay 2021 Young-of-Year Survey Results Announced. <https://news.maryland.gov/dnr/2021/10/15/chesapeake-bay-2021-young-of-year-survey-results-announced/>.

<sup>7</sup> Atlantic States Marine Fisheries Commission. August 2019. Interstate Fisheries Management Program Charter. [https://www.asmfc.org/files/pub/ISFMPCharter\\_Aug2019.pdf](https://www.asmfc.org/files/pub/ISFMPCharter_Aug2019.pdf).

Emilie Franke. ASMFC  
April 14, 2022  
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Very truly yours,

FOR THE STATE OF CONNECTICUT

A handwritten signature in blue ink, appearing to read 'W. Tong', with a stylized flourish at the end.

WILLIAM TONG  
Attorney General of Connecticut  
165 Capitol Avenue  
Hartford, CT 06106

FOR THE STATE OF RHODE ISLAND

A handwritten signature in blue ink, appearing to read 'P. Neronha', with a large, sweeping flourish.

PETER F. NERONHA

Attorney General of Rhode Island  
150 South Main Street  
Providence, RI 02903

FOR THE COMMONWEALTH OF MASSACHUSETTS

A handwritten signature in blue ink, appearing to read 'M. Healey', with a large, sweeping flourish.

MAURA HEALEY  
Attorney General of Massachusetts  
One Ashburton Place, 18<sup>th</sup> Floor  
Boston, MA 02108



1075 Tooker Avenue  
West Babylon, NY 11704  
March 16, 2022

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

Dear Ms. Franke:

Below find my comments on the *Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass for Public Comment* (the "Draft Amendment"). I have been a participant in the recreational striped bass fishery for more than 50 years, fishing primarily off Connecticut and New York, although also in the waters of other states between Virginia and Massachusetts. I have been involved with striped bass management issues and fisheries advocacy since the stock collapsed in the late 1970s, and have seen how various approaches to fishery management have affected the striped bass population.

The following comments are based upon such experience.

I

**MANAGEMENT TRIGGERS**

**Management triggers should assure prompt and effective management response when potential threats to the stock arise.**

A

**FISHING MORTALITY TRIGGERS**

**Fishing mortality triggers should be designed to prevent overfishing, and to promptly end overfishing at the first indication that it may have occurred.**

1

**OPTION A: TIMELINE TO REDUCE F TO THE TARGET**

**Sub-option A1, which maintains the current requirement that fishing mortality be reduced to target within one year, is the preferable choice; phasing in management measures over two years would require multiple rule changes and be contrary to the principle of management stability.**

Delays in responding to threats to the stock will never benefit the striped bass resource.

There may be times when delay is inevitable. However, the Atlantic Striped Bass Management Board (the "Management Board") has twice, in the recent past, demonstrated that it is capable of reducing fishing mortality to target within one year, first in 2014, when it adopted *Addendum IV to Amendment 6 to the Atlantic Striped Bass Interstate Fishery Management Plan* ("Addendum IV"), reducing fishing

mortality by 25%, and again in 2019, when it adopted *Addendum VI to Amendment 6 to the Atlantic Striped Bass Interstate Fishery Management Plan* (“Addendum VI”), leading to reduction of over 18%.

In both cases, the Management Board successfully reduced fishing mortality not merely to, but below, the target level. Thus, there is no basis for an argument that two years might be required to achieve the mandated reduction.

Some might argue that phasing in a reduction over two years would somehow benefit the fishing industry. However, such phase-in, which would require management measures to be altered in two consecutive years, is contrary to the principle of management stability.

Since the measures ultimately needed to reduce fishing mortality to the target are likely to remain in place for multiple years, to maintain such mortality at the indicated level, there is little to gain by dragging out the reduction process. Just as it generally causes less overall pain to quickly tear a bandage off a wound rather than remove it slowly, so imposing needed management measures in a single, effective stroke causes the least overall disruption to fisheries, and allows them to begin operating at the new, lower level sooner than would otherwise be the case.

## 2

### **OPTION B: F THRESHOLD TRIGGERS**

**Sub-option B1, which maintains the current requirement that management action to reduce fishing mortality be taken at the first indication that the threshold has been exceeded, minimizes potential harm to the striped bass stock by preventing extended periods of overfishing.**

To state the obvious, overfishing can only harm the striped bass stock, and should be ended as soon as it appears. Sub-option B1 achieves that goal.

While there is always some uncertainty in the estimate of fishing mortality in the terminal year of a stock assessment, and so the possibility that an assessment might find overfishing when mortality actually remains very slightly below the threshold, the possibility of that occurring does not justify the delay associated with sub-option B2, and the potential for increased harm to the stock.

The 2018 benchmark stock assessment reveals that “very little retrospective trend (+/-2%) was evidenced in the more recent estimates of fully-recruited F.”<sup>1</sup> Such slight retrospective trend doesn’t justify overfishing to continue for no less than two additional years (assuming that overfishing first occurred in the terminal year of a stock assessment, and that the Management Board was able to adhere to its plan of updating the stock assessment every two years, sub-option B2 could, as a practical matter, allow three years to lapse, as opposed to sub-option B1’s one year, before any attempt was made to reduce fishing mortality), particularly because, should the fishing mortality rate rise so close to the fishing mortality threshold that the issue even arises, prudence dictates that the time for action has already arrived.

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<sup>1</sup> Northeast Fisheries Science Center (NEFC), 2019, 66<sup>th</sup> Northeast Regional Stock Assessment Workshop (66<sup>th</sup> SAW) Assessment Report, US Dept. Commerce, Northeast Fish Sci Cent Ref Doc 19-08, p. 539

**3**

**OPTION C: F TARGET TRIGGERS**

**An F target trigger is needed to prevent overfishing from occurring. While sub-option C1, which links increasing fishing mortality to a decreasing biomass, is the preferable option, sub-option C2 is also a viable choice. Sub-option C3 is completely unacceptable.**

Excessive fishing mortality is a problem when it leads to reduced spawning stock biomass. Thus, sub-option C1, which maintains a management trigger that only trips when above-target fishing mortality is concurrent with, and possibly a cause of, below-target biomass, is the preferable option.

Fishing mortality will inevitably slip above target from time to time. However, such occasional increases in fishing mortality create no appreciable threat to the stock so long as abundance is high and spawning stock biomass remains at or above its target level. It is only when spawning stock biomass begins to decline in the face of higher fishing mortality that action needs to be taken. Such link between the two reference points would make it unnecessary to take management action, even in the fact of the consecutive years of fishing mortality contemplated in sub-option C2, so long as spawning stock biomass remains at or above target.

Sub-option C3 is not at all acceptable, because it removes the fishing mortality target trigger, which serves as a buffer to prevent overfishing from ever occurring. The Management Board should not operate in a crisis management environment, where it will act only after overfishing has occurred and poses a significant risk to the striped bass stock, and severe management measures are required to avert the threat. Instead, by retaining a fishing mortality target trigger, the Management Board will be intervene when the situation is less dire, and more modest measures will likely be sufficient to maintain the sustainability of the striped bass resource.

**B**

**FEMALE SPAWNING STOCK BIOMASS (SSB) MANAGEMENT TRIGGERS**

**Spawning stock biomass triggers should be designed to prevent the stock from becoming overfished, and to require prompt rebuilding of the stock should a trigger be tripped.**

**1**

**OPTION A: DEADLINE TO IMPLEMENT A REBUILDING PLAN**

**Sub-option A2, which requires the Management Board to initiate a rebuilding plan within two years after a spawning stock biomass rebuilding trigger is tripped, should be included in the final amendment.**

It is impossible to know what the current state of the striped bass stock might have been, had the Management Board performed its duty to initiate a rebuilding plan after Management Trigger 4 was

tripped by the 2013 benchmark stock assessment,<sup>2</sup> instead of following the then-Fishery Management Plan Coordinator's advice not to take such action.<sup>3</sup>

While the 2018 benchmark assessment, which incorporated revised, and far higher, estimates of recreational fishing mortality than its predecessor, revealed that the stock was probably already overfished in 2014,<sup>4</sup> and any rebuilding plan that might have been put in place at that time, based on the information available, would probably have been inadequate to accomplish its goal, the very existence of such a plan might have led to closer monitoring of the stock, and additional efforts to prevent its further decline.

Providing the Management Board with a hard deadline for implementing a rebuilding plan would shield the stock from the consequences of similar, future inaction, and will also grant the public an earlier opportunity to enjoy the benefits of a rebuilt stock. The same two-year deadline for implementing a rebuilding plan exists in federal fisheries law,<sup>5</sup> and has contributed to federal fishery managers' success in restoring once overfished stocks.

## 2

### **OPTION B: SSB THRESHOLD TRIGGER**

**Sub-option B1, which would include a spawning stock biomass threshold trigger in Amendment 7, should be retained.**

It has been suggested that a spawning stock biomass threshold trigger is not needed so long as a spawning stock biomass target trigger is included in Amendment 7. However, such suggestion ignores the fact that such trigger provides a valuable backstop should the spawning stock biomass target trigger somehow fail, or should the Management Board take no action when such target trigger is tripped.

That is the precise situation that the Management Board finds itself in today. As noted in subsection 1, above, the Management Board elected to do nothing when the spawning stock biomass target trigger was tripped by the 2013 benchmark stock assessment. The currently contemplated rebuilding plan, expected to be initiated after the completion of the 2022 stock assessment update, will have been the result of the spawning stock biomass threshold trigger being tripped by the 2018 benchmark assessment.

History thus demonstrates the need for a threshold trigger.

In any event, such trigger creates no added burdens for the Management Board or for stakeholders; there is no practical reason for its removal, and it remains a meaningful safeguard in the event that Management Board again shirks its obligations pursuant to the target trigger.

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<sup>2</sup> Northeast Fisheries Science Center (NEFC), 2013, 57<sup>th</sup> Northeast Regional Stock Assessment Workshop (57<sup>th</sup> SAW) Assessment Report, pp. 492 *et seq.*

<sup>3</sup> Atlantic States Marine Fisheries Commission, *Proceedings of the Atlantic States Marine Fisheries Commission Atlantic Striped Bass Management Board*, August 5, 2014, p. 10, comments of Michael Waine.

<sup>4</sup> *Ibid.*, Northeast Fisheries Science Center, 2019, p. 830

<sup>5</sup> 16 U.S.C. 1864(e)(3)

**OPTION C: SSB TARGET TRIGGER**

**Practical concerns favor sub-option C1, although sub-option C2 is also acceptable. Sub-option C3 represents bad policy, and should be rejected.**

In theory, sub-option C2 represents the best choice. The Management Board's primary objective should be to maintain spawning stock biomass at or near the target level, so if such biomass falls below target for an extended period, management action should, ideally, be taken, even if fishing mortality remains at or below target. As a practical matter, the biomass of many fish stocks, including striped bass, frequently hovers somewhere between target and threshold; implementing a rebuilding plan merely because biomass levels remain slightly below target over the course of three years is probably management overkill, and could result in the trigger often being tripped. Adopting the current standard, represented by sub-option C1, and so adding a second requirement that fishing mortality be above target before action must be taken, adds a needed brake to the spawning stock biomass target trigger.

Eliminating the spawning stock biomass target trigger would be a mistake, as it would delay management action until the stock has become overfished, and probably require a more restrictive rebuilding plan than would be needed if action were taken sooner.

At least in this century, the Management Board has never acted preemptively to avert a threat to the stock unless a management trigger has first been tripped. Even after the 2011 stock assessment update predicted that, under any recruitment scenario, the striped bass stock would become overfished by 2017,<sup>6</sup> various Management Board members declared striped bass to be a "green light fishery,"<sup>7</sup> and decided to take no action because no triggers had yet been tripped.<sup>8</sup> Thus, a spawning stock biomass target trigger, that prevents the Management Board from doing nothing and again allowing the stock to become overfished, is a very badly needed component of Amendment 7.

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<sup>6</sup> Atlantic States Marine Fisheries Commission Striped Bass Stock Assessment Subcommittee and Striped Bass Tagging Subcommittee, *Striped Bass Stock Assessment Update 2011*, November 8, 2011, p. 4

<sup>7</sup> Atlantic States Marine Fisheries Commission, *Proceedings of the Atlantic States Marine Fisheries Commission Atlantic Striped Bass Management Board*, November 8, 2011, comments of Dr. Jamie Geiger, p. 10; comments of James Gilmore, p. 15.

<sup>8</sup> *Ibid.*, comments of Pat Augustine, p. 9; comments of Dr. Wilson Laney, p. 10; comments of Thomas Fote, pp. 14-15.

## C

### RECRUITMENT TRIGGERS

**The current recruitment trigger fails in two respects: It has proven to be insufficiently sensitive to trigger management action during extended periods of low recruitment, and if triggered, it doesn't require that management be taken.**

## 1

### OPTION A: RECRUITMENT TRIGGER DEFINITION

**The increased sensitivity of sub-options A2 and A3 represents a meaningful improvement to the current recruitment trigger; which sub-option is more appropriate should be determined by the Atlantic Striped Bass Technical Committee, not lay stakeholders.**

Although some spawning areas have, at times, produced relatively strong year classes, overall striped bass recruitment has been low for nearly two decades, yet the current recruitment trigger has never tripped, nor initiated any management action, even though such generally low recruitment, coupled with a lack of management response, has contributed to the current, troubled state of the striped bass stock. Thus, sub-option A1 should be rejected.

Whether sub-option A2 or A3 is the preferable alternative is a decision that we lay stakeholders are probably not qualified to make. We rely on the expert advice of the Technical Committee for guidance on such issues; whether the greater sensitivity of sub-option A3, as appealing as it might appear, would improve or hinder the Management Board's ability to maintain the long-term health of the striped bass stock is something that we lack the knowledge and technical skills to determine. However, either sub-option A2 or A3 would be an improvement over the current recruitment trigger.

## 2

### OPTION B: MANAGEMENT RESPONSE TO RECRUITMENT TRIGGER

**Sub-option B2, which would require the Management Board to act promptly should the recruitment trigger be tripped, is the only viable choice among the three options.**

History has amply demonstrated that the Management Board is loath to adopt more restrictive management measures unless compelled by explicit language in the management plan. Sub-option B2 is the only option that would so compel the Management Board to act, and to act promptly.

Should the recruitment trigger be tripped, sub-option B1 leaves any management action up to the sole discretion of the Management Board, virtually assuring that no action will be taken. Depending on the fishing mortality trigger options incorporated into Amendment 7, sub-option B3 could provide the Management Board with a means to delay taking action for years, despite an extended period of low recruitment; such delay would probably extend past the completion of the next stock assessment, and so completely frustrate the purpose of the recruitment trigger.

## D

### DEFERRED MANAGEMENT ACTION

**Taking prompt management action in response to potential threats to the striped bass stock is necessary to assure the health and long-term sustainability of the striped bass resource; for that reason, Option A, *status quo*, is the only viable option**

Delay is the Management Board's defining flaw. Taking preemptive action to avert a looming threat to the striped bass stock is not in its nature; unless compelled to act by the management plan, and sometimes not even then (consider the failure to adopt a rebuilding plan, despite being required to do so, in 2014, and the current delay in initiating a rebuilding plan that was triggered when the most recent benchmark assessment was accepted in 2019), the Management Board will generally seek to perpetuate the *status quo*.

That being the case, it is easy to see the Management Board taking advantage of every and any opportunity to defer action provided by Options B, C, D, E, and F, should any such options be incorporated into Amendment 7. The striped bass would suffer as a result.

While none of the deferral options are benign, Option B is particularly dangerous, as it would allow a serious threat to the stock to continue for years, if even a minor management action had been taken earlier. Under such option, if the Management Board took even the smallest management action within the previous three years, perhaps imposing a minimal fishing mortality reduction in response to low recruitment in the Delaware or Hudson River, and a stock assessment released the next year found the stock to be overfished or experiencing severe overfishing, the Management Board could, and based on past performance would, delay addressing the greater threat until the next stock assessment was performed.

The implications of such inaction for the striped bass stock would not be good.

Thus, Option A should be adopted.

## II

### RECREATIONAL RELEASE MORTALITY

**As stated in the Public Information Document For Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass (the "PID"), "The source of mortality does not matter to the health of the stock, as long as the overall fishing mortality is below the threshold."<sup>9</sup> Thus, it is inappropriate to single out recreational release mortality, and ignore other sources of fishing mortality, in Amendment 7, although measures to promote the survival of released fish are worthwhile. Options C1 and C2, requiring non-lethal landing devices and requiring the release of any striped bass caught by unauthorized means, should be incorporated into Amendment 7.**

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<sup>9</sup> Atlantic States Marine Fisheries Commission, *Public Information Document For Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass*, February 2021, p. 18

The value of any of the options included in Section 4.2.2 of the Draft Addendum is speculative; the reduction in fishing mortality that each is likely to achieve has not been quantified. Such uncertainty casts doubt on the effectiveness of the options.

Having said that, sub-option C1, which would prohibit the use of gaffs or other lethal devices to land striped bass, would clearly result in enhanced striped bass survival. Although some persons may argue that striped bass *can* survive gaff-and-release,<sup>10</sup> such fish *will* undoubtedly be more likely to survive being caught and released if their bodies are not punctured by gaffs or similar devices. Thus, Option C1 should be included in Amendment 7.

Sub-option C2, which would require the release of any striped bass caught on unauthorized gear would, as a practical matter, enhance the enforceability of the circle hook requirement adopted in Addendum VI.<sup>11</sup> While some states have already adopted such requirement with respect to circle hooks, others have not, and thus provide anglers with a means for invading Addendum VI's circle hook mandate. Sub-option C2 would probably make compliance with the circle hook requirement more likely; thus, it should be included in Amendment 7.

The striped bass fishing closures contemplated by Option B are not so easily justified.

Sub-option B1's state-specific main-season closures present multiple problems. The greatest of those is probably that prohibitions on targeting striped bass are not practically enforceable. The Atlantic States Marine Fisheries Commission's Law Enforcement Committee expressed strong reservations about the enforceability of such closures at the February 2022 Winter Meeting; such reservations are fully justified, given that the striped bass season overlaps with the seasons for other species caught at the same time on the same baits and lures. As Dr. Michael Armstrong noted at the October 2021 Management Board meeting, "it's completely unenforceable, the no targeting aspect...as long as you have bluefish in the water, you are fishing for striped bass. It's just an unenforceable thing."<sup>12</sup>

Furthermore, sub-option B2 would place a far heavier burden on some states, particularly in New England, than it would on others. In Maine, where the season spans only a few months, the two-week no-targeting closure, particularly if sub-option B1-b's requirement that it occur during a wave when at least 25% of directed striped bass trips take place applied, would carve out a significant piece of the summer fishing season, causing real harm to recreational fishermen and the businesses that they support. In New Jersey, the same 25% requirement would allow the state to shut down the last 14 days of December, a closure that would have a far lesser impact on anglers and the angling industry.

Finally, small-scale management measures, such as seasonal closures, do not belong in an amendment, which should remain focused on broader management issues. Such closures are more appropriately placed in an addendum intended to resolve a specific management issue, where seasons, size limits, and

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<sup>10</sup> See Atlantic States Marine Fisheries Commission, *Proceedings of the Atlantic States Marine Fisheries Commission Atlantic Striped Bass Management Board*, October 20, 2021, p. 47, comments of Adam Nowalsky

<sup>11</sup> Atlantic States Marine Fisheries Commission, *Addendum VI to Amendment 6 to the Atlantic Striped Bass Interstate Fishery Management Plan*, October 30, 2019, pp. 10-11

<sup>12</sup> *Ibid.*, p. 42, comments of Dr. Michael Armstrong



bag limits combine in a single, situation-specific set of measures. It is very possible that, once the 2022 stock assessment update is released, the subsequent rebuilding plan may need to incorporate some sort of seasonal closures. If so, the issue should be addressed then, and not in Amendment 7.

Spawning season closures, of the sort contemplated in sub-option B2, might benefit the striped bass stock by diverting pressure from already vulnerable fish, and preventing fishermen from targeting spawning aggregations of striped bass. However, the specific closures presented in such sub-option were not well thought out.

Sub-option B2-a, which would prohibit recreational striped bass harvest during Waves 1 and 2 (January through April) might make sense in the Chesapeake Bay, and perhaps on the Delaware River. However, because fish in more northern rivers spawn later in the year, it would offer far lesser protections to spawning striped bass in the Hudson and Kennebec rivers. A far better approach would be to require states to designate a four-month period occurring sometime during Waves 1, 2, or 3, so that the harvest prohibition would have a similar effect in all spawning areas. Such a prohibition, crafted for greater effect and included in a later addendum, could prove to be a worthwhile management measure.

Sub-option B2-b lacks merit. Like sub-option B1, its non-targeting requirement is unenforceable. However, given the characteristics of spawning-waters fisheries, sub-option B2-b could actually cause greater harm to spawning striped bass, as they are “accidentally” caught by anglers claiming to fish for riverine species such as catfish and white perch; such anglers, because of their purported targets, could legally fish with J-hooks and bait, and thus cause greater levels of release mortality than they would if allowed to target striped bass, either with artificial lures or with circle hooks and bait.

Sub-option B2-b’s closure is also too short to have a meaningful impact on striped bass mortality, as it would permit anglers not only to target, but also to harvest, striped bass on either side of the two-week closure; because the timing of the striped bass spawn is dependent upon water temperature, it is unlikely that any pre-established closure will align with the peak of spawning activity. Thus, a combination of spawning fish harvested outside of the closure period and the fishing mortality resulting from striped bass caught by anglers targeting striped bass under the guise of fishing for other species during the closure would minimize the benefits accruing from sub-option B2-b closure.

### III

#### REBUILDING PLAN

**The Management Board should initiate a striped bass rebuilding plan, incorporating conservative assumptions, at the earliest practicable time.**

#### A

##### RECRUITMENT ASSUMPTION FOR REBUILDING CALCULATION

**The rebuilding calculation should incorporate Option B’s assumption of a low recruitment regime.**

Striped bass recruitment has been trending lower in recent years. In the Maryland section of the Chesapeake Bay, arguably the single most important spawning area, there have been four strong year

classes so far this century: 2001, 2003, 2011, and 2015.<sup>13</sup> Of the four, the 2001 and 2003 year classes, after being subject to harvest for many years, constitute a very small proportion of the spawning stock, while the 2011 year class, while initially large, recruited into the population at age 1 in lower numbers than did the substantially smaller year class of 2015.<sup>14</sup>

That will make it difficult for the Management Board to rebuild the stock; although the 2017 and 2018 year classes in Maryland were slightly above average, all subsequent year classes were disappointingly small. Thus, in order to give any rebuilding plan its best chance for success, basing it on a low recruitment regime only makes sense.

## B

### REBUILDING PLAN FRAMEWORK

**Because the Management Board faces a 2029 deadline for rebuilding the striped bass stock, Option B, which would permit it to begin rebuilding without first taking the rebuilding plan out for public hearing, should be adopted.**

Management Trigger 2, which requires the Management Board to adopt management measures to rebuild the stock within ten years,<sup>15</sup> was tripped when the 2019 stock assessment was accepted for management use in May 2019. Because the Management Board chose not to immediately initiate a rebuilding plan, it has painted itself into a corner, and now has only 7 years to draft and implement a rebuilding plan that will successfully rebuild the striped bass stock within the required period.

That isn't much time, particularly given that, if the rebuilding plan followed the usual path for an addendum to the management plan, with a draft, opportunity for public hearing, and then final deliberations leading to the completed management document, any rebuilding measures wouldn't become effective until 2024, effectively cutting the 10-year rebuilding timeline in half.

Allowing the Management Board to fast-track the rebuilding plan, and not go through the full addendum process, could allow the plan to become effective in the spring of 2023, providing more rebuilding time. While some may be concerned about the lack of public hearings, that is probably not a critical consideration, as the testimony on the PID a year ago made it clear that stakeholders wanted to see a rebuilding plan implemented as quickly as possible,<sup>16</sup>

Rebuilding the striped bass spawning stock biomass to the target level by 2029 is likely to prove daunting under any circumstances. By providing an extra year to rebuild, Option B can only help.

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<sup>13</sup> Maryland Department of Natural Resources, "Juvenile Striped Bass Survey," available at <https://dnr.maryland.gov/fisheries/pages/striped-bass/juvenile-index.aspx>

<sup>14</sup> *Ibid.*, Northeast Fisheries Science Center, 2019, p. 827

<sup>15</sup> Atlantic States Marine Fisheries Commission, Amendment 6 to the Interstate Management Plan for Atlantic Striped Bass, February 2003, p. 31

<sup>16</sup> See Emilie Franke, Memorandum to Atlantic Striped Bass Management Board, April 19, 2021, available at [http://www.asmf.org/files/Meetings/2021SpringMeetingWebinar/StripedBassAm7PID\\_PublicCommentsAndSummary.pdf](http://www.asmf.org/files/Meetings/2021SpringMeetingWebinar/StripedBassAm7PID_PublicCommentsAndSummary.pdf)

## VI

### MANAGEMENT PROGRAM EQUIVALENCY

**Any use of conservation equivalency must not threaten the health of the striped bass stock, must be based on reasonably precise data, must not undercut the success of the management program, and must comply with the *Interstate Fishery Management Program Charter (the "Charter")*.**

#### A

##### **OPTION B: RESTRICT THE USE OF CONSERVATION EQUIVALENCY BASED ON STOCK STATUS**

**Conservation equivalency should not be used when significant threats to the striped bass stock exist**

#### 1

##### **RESTRICTIONS**

**Conservation equivalency should not be used when the stock is overfished or experiencing overfishing; sub-options B1-a and B1-c should be included in Amendment 7.**

Stocks facing serious threats, including those experiencing overfishing and those which have become overfished, must be managed more conservatively than stocks which enjoy fishing mortality rates and spawning stock biomass that are at or near target levels.

Since conservation equivalent measures are based on less precise state-level data, and so are less likely to constrain fishing mortality than coastwide measures, they are inherently less conservative than measures based on coastwide data. That being the case, conservation equivalency should not be used when fishing mortality rises above or female spawning stock biomass falls below their respective thresholds.

#### 2

##### **APPLICABILITY**

**Restriction on the use of conservation equivalency should not extend to fisheries where such use leads to more conservative management, or at least could not lead to less conservative management, than would the coastwide standard measures; thus, sub-option B2-a, limited to only Delaware Bay, and sub-option B2-b, should be included in Amendment 7.**

As noted earlier, the greatest problem with conservation equivalency is that it can allow states to adopt measures that, in practice, prove less effective at constraining fishing mortality than the coastwide standard measures, an issue that can undercut the efficacy of management actions. However, in situations where conservation equivalency results in more conservative management, its use should not be restricted.

Such situations exist in both the Hudson and Delaware Rivers.

In the Hudson River, New York limits harvest to striped bass measuring between 18 and 28 inches long, a regulation that focuses harvest on male striped bass, and prohibits the harvest of most mature females. Requiring New York to abandon such rule and impose the coastwide 28- to 35-inch slot would

instead focus angler effort on mature spawning females, the very spawning stock biomass that the Management Board needs to rebuild.

A similar situation exists on the Delaware River, where Pennsylvania has adopted a 21- to 24-inch slot limit which is intended to protect spawning females.

However, the slot limit in Delaware Bay is not intended to protect vulnerable spawning-age females, but instead to increase the landings of male striped bass during a time when larger females are often unavailable.<sup>17</sup> Given that the intent of such slot limit is to increase overall fishing mortality, not to protect female spawning stock biomass, it is inappropriate to exempt Delaware Bay from the restrictions on the use of conservations equivalency.

Thus, sub-option B2-a should be adopted, but only with respect to Delaware Bay, and not to the Hudson and Delaware Rivers.

As commercial fisheries are quota-managed, and quotas are adjusted for the conservation impact of size limits that drop below the 28-inch minimum size, there is no need to include sub-option B2-c in Amendment 7.

Sub-option B2-b presents a different issue. It applies only to so-called “bonus programs” that transfer commercial striped bass quota to the recreational sector. As noted in the Draft Amendment, the only such program now in effect is in New Jersey, and targets 24- to 28-inch striped bass.

Thus, the New Jersey program concentrates effort within a slot size limit that is likely to include a high percentage of immature females. No existing commercial fishery, including those which permit the harvest of striped bass less than 28 inches long, restricts landings to such a size limit. The resultant removals of immature females can only hamper efforts to rebuild female spawning stock biomass. Thus, it would be logical to prohibit such quota-managed recreational fisheries from using conservation equivalency during times when the stock faces threats. Sub-option B2-b should be incorporated into Amendment 7.

## B

### OPTION C: PRECISION STANDARDS FOR MRIP ESTIMATES USED IN CONSERVATION EQUIVALENCY PROPOSALS

**Because MRIP estimates with a PSE greater than 30 are generally deemed unreliable for fishery management purposes, sub-option C3 should be adopted.**

The Draft Amendment includes the definitive statement on this issue: “NMFS warns that ‘[MRIP] Estimates should be viewed with increasing caution as PSEs increase beyond 30...’ In addition, NMFS is implementing new Recreational Fishing and Data Standards under which estimates will not be published if the PSE is greater than 50 and *estimates with a PSE of 30 or more will be presented with a warning*”

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<sup>17</sup> See Atlantic States Marine Fisheries Commission, *Proceedings of the Atlantic States Marine Fisheries Commission Atlantic Striped Bass Management Board*, October 20, 2008, comments of Dr. Desmond Kahn, p. 9

***that they 'are not sufficiently reliable for most purposes, and should be treated with caution.'***  
[emphasis added]"

If the National Marine Fisheries Service does not consider estimates with a PSE greater than 30 "reliable for most purposes," the Management Board should not consider such estimates a reliable basis for conservation equivalency proposals. Sub-option C3 should be included in Amendment 7.

## C

### **OPTION D: CONSERVATION EQUIVALENCY UNCERTAINTY BUFFER FOR NON-QUOTA MANAGED FISHERIES**

**The uncertainty buffer should track the potential imprecision of the data used; thus, if sub-option C3 is selected for Option C, then sub-option D2, a 25% buffer, would be appropriate; however, if sub-options C1 or C2 are selected, or no precision standard is established at all, then sub-option D3, 50%, would be needed to offset the greater uncertainty.**

Option C would establish a standard for data precision in conservation equivalency proposals, but it would still permit the use of state-level data with relatively high PSEs. Recognizing that such imprecise data may still be used, the uncertainty buffer established by Option D should be large enough to buffer against the most imprecise data likely to be used. Thus, the decision on which Option D sub-option to choose is closely linked to the decision made with respect to data precision.

If the data used in conservation equivalency proposals is limited to estimates with a PSE no greater than 30, then sub-option D2, 25%, is a reasonable selection. However, if data with PSEs of 40 or 50 may be used, or if no precision standard is established at all, then sub-option D3, 50%, would be the more appropriate choice.

## D

### **OPTION E: DEFINITION OF EQUIVALENCY FOR CE PROPOSALS WITH NON-QUOTA MANAGED FISHERIES**

**"Conservation equivalency" is defined in the Charter, which requires that conservation equivalent measures "achieve the same quantified level of conservation for the resource under management."  
Only sub-option E2 complies with that standard.**

The Charter unambiguously defines "conservation equivalency" as

**Actions taken by a state which differ from the specific requirements of the FMP, but which achieve *the same* quantified level of conservation *for the resource under management*. For example, various combinations of size limits, gear restrictions, and season length can be demonstrated to achieve *the same* targeted level of fishing mortality. The appropriate Management Board/Section will determine conservation equivalency. [emphasis added]**

Such definition makes it perfectly clear that the standard to be applied when evaluating conservation equivalency proposals is whether the allegedly conservation equivalent proposal would have the same

impact ***on the resource*** as the standard coastwide management measures. The relative impacts on anglers in different states, or on a particular sector within the recreational fishery, is irrelevant to such determination. The only thing that matters is whether any such “*achieves the same quantified level of conservation for the resource under management.*”

The Management Board failed to comply with the Charter’s strictures when adopting conservation equivalency for Addendum IV and Amendment VI. In both cases, the Management Board, in clear contravention of the Charter’s language, only required states to achieve the same level of fishing mortality reductions as were achieved, on a coastwide basis, by the coastwide standard management measures. As a result, state conservation equivalency measures failed to achieve the same quantified level of conservation for the striped bass resource.

That failure was particularly egregious in Addendum VI, where state conservation equivalency measures collectively reduced such addendum’s already marginal 50% probability of success to an unacceptable 42%.<sup>18</sup> That 8% reduction in the probability of the addendum achieving its goals makes it clear that state conservation equivalency measures achieved a lesser level of conservation for the resource under management.

While such result violates the terms of the Charter, it would nonetheless be enshrined in sub-option E1. Thus, such sub-option should not be adopted.

As the Draft Amendment explains,

Suppose an FMP standard is adopted that is projected to achieve a 20% change in fishery removals when applied coastwide. However, at the state level, the FMP standard is projected to achieve a 25% change in State A and a 10% change in State B...

Notably, ***sub-option E-1 may undermine an overall targeted reduction...*** [emphasis added]

Undermining the targeted coastwide reduction is a very different thing from achieving the same quantified level of conservation, and from the Charter’s requirement that conservation equivalent measures “achieve the same targeted level of fishing mortality.”

Thus, in order to best protect the long-term health of the striped bass resource, and to comply with the clear language of the Charter, sub-option E2 must be included in Amendment 7.

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<sup>18</sup> Atlantic States Marine Fisheries Commission, *Proceedings of the Atlantic States Marine Fisheries Commission Atlantic Striped Bass Management Board*, May 5, 2020, comments by Dr. Katie Drew, p. 2, “The predicted reductions, the new predicted total removals in 2020 is a 15 percent reduction from 2017 levels compared to the 18 percent reduction predicted for the consistent coastwide Addendum VI measures. The updated projections indicate a 42 percent chance of being at or below the F target in 2020, compared to a 50 percent chance that was calculated with the original projection.”

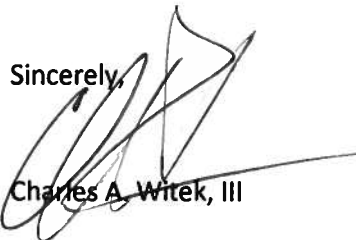
V  
SUMMARY

Amendment 7 has the potential to bring meaningful improvements to the striped bass management program; it also has the potential to undercut existing, beneficial management measures. I ask that, in evaluating the various options, the Management Board place greatest emphasis on measures that will best assure the long-term health of the striped bass stock, rather than on bureaucratic concerns or on short-term inconveniences to the commercial or recreational fishery.

In the end, it is impossible to have healthy fisheries without also having healthy and abundant fish stocks. That is particularly true in the case of fish like striped bass, where the fishery is primarily recreational, and primarily focused on the recreational benefits to be gleaned from the resource; in such cases, the greatest overall social and economic benefits flow from greatest practicable abundance, and not the greatest practicable yield.

The comments that I have set forth above reflect that simple fact.

Thank you for considering my thoughts on such matters.

Sincerely,  
  
Charles A. Witek, III

Apr 8, 2022

Hello,

My name is Galen Donovan, I am 20 years old, and I am a fisherman.

I have been fishing all my life, and for the past 7 years, Striped bass have been my favorite fish to catch. I can't even put into words exactly what or even how much these fish mean to me.

They are a part of who I am.

I have not kept a single striped bass since the summer of 2018, because that is when I realized how poorly the species was doing. I have since convinced my family and friends alike to practice good catch and release with these noble fish. I want striped bass to be around, and to thrive, for as long as Mother Nature will allow.

My reason for writing you this letter is because I am appalled at the lack of action taken to help these fish, this species, come back from the sad status they're at now.

My fellow anglers and I all see that this species, the Atlantic Striped Bass, is suffering and population numbers are crashing. We have seen it for years now, and yet nothing is being done to stop it!

I sincerely hope that with these amendments there will finally be action taken to help these fish come back to better and stronger numbers than any recent years, and that plans will be put in place to help them remain abundant for a very long time.

To the back of this letter I have attached my choices for amendment 7. In my honest opinion these are the best choices to try and save this species.

Please, please hear all of us out here who are fighting to save this species.

On behalf of myself and all of my fellow anglers and conservationists who are hoping and praying that the people in charge will stop ignoring us, please do everything you can to bring this species back. Choose the long run. Help us keep these fish around and thriving for generations to appreciate.

"Don't it always seem to go, that you don't know what you've got til it's gone."

Don't let this species be the next thing gone.

Most sincerely thank you,

Galen Donovan

Galen Donovan

4/8/2022



**4.1 Management Triggers:**

**Tier 1:**

- Option A1
- Option B1
- Option C1

**Tier 2:**

- Option A2
- Option B1
- Option C1

**Tier 3:**

- Option A3
- Option B2

**Tier 4:**

- Option A

**4.2.2 Recreational Release Mortality**

- Option A
- Option B1: Opposed
- Option B2: Opposed
- Option C1
- Option C2
- Option D1

**4.4.1 Rebuilding Plan**

Option B

**4.4.2 Rebuilding Plan Framework**

Option B

**4.6.2 Management Program Equivalency**

- Sub-Option B1a
- Sub-Option B1c
- Sub-Option B2b
- Sub-Option C3
- Sub-Option D3
- Sub-Option E2

Carl Tiska  
24 Van Zandt Ave  
Newport RI 02840  
carl.tiska@gmail.com

March 13, 2022

Emilie Franke  
FMP Coordinator  
1050 N. Highland St., Suite 200 A-N  
Arlington, Virginia 22201

Dear Members of the Atlantic Striped Bass Board,

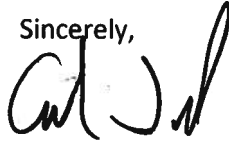
I am a recreational kayak angler in Rhode Island with a focus on harvesting, cooking, and eating my catch. Despite my fishing focus, I believe that striped bass should be managed for abundance, using the most conservative measures proposed, even if it reduces my opportunity to harvest this iconic species. Consequently, my positions on the proposals within the Draft Amendment Seven are as follows:

- Fishing mortality management triggers
  - Timeline to reduce fishing mortality to the target:
    - I support option A-1 (status quo)
  - Fishing Mortality Threshold Triggers:
    - I support option B1 (status quo)
  - Fishing Mortality Target Triggers:
    - I support option C1 (status quo)
- Female spawning stock biomass management triggers
  - Deadline to initiate rebuilding
    - I support option A-2
  - SSB Threshold Triggers
    - I support option B-1 (status quo)
  - SSB target triggers
    - I support option C-1 (status quo)
- Recruitment triggers
  - Recruitment trigger definition
    - I support option A-3
  - Management Response to Recruitment Triggers
    - I support option B-2
- Deferred Management Action
  - I support option A (status quo)
- Fishing season closures
  - I support option B-1
- Gear restrictions
  - I support options C-1 and C-2
- Angler education

- I support option D-2
- Recruitment Assumption for Rebuilding Calculation
  - I support option B
- Rebuilding Plan Framework
  - I support option B
- Management Program Equivalency
  - I support options B-1a and B-1c, B-2b, C-3, D-3, and E-2

I thank you for your work in managing striped bass and for the opportunity to provide feedback on the Draft Amendment Seven.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carl Tiska', written in a cursive style.

Carl Tiska

To, A.S.M.F.C.

I am a commercial waterman in the Potomac River and in Maryland. I am writing to you today about Striped Bass Amendment 7 and the possibility of further reductions in our Striped Bass Quota in the Potomac River.

We are and have been for years on a totally transparent reporting system with mandatory weekly reporting.

We have only exceeded our annual quota once in the last 20 years and that was by a small amount.

The commercial Striped Bass fishery only accounts for 10% of the total A.S.M.F. Striped Bass harvest.

We should not have to suffer further cuts in commercial Quota, which would greatly and adversely affect our lively hood and local and national economy.

We are doing our part in the Potomac River in the form of Conservation Equivalency. This is when the recreational Striped Bass season is closed from July 7th thru August 20th in 2022. This is when we normally experience our hottest weather and warmest water temperatures. Under these conditions the mortality rate of released Striped Bass is much greater.

**USA**

"Peace through Strength..."



Myself and other commercial waterman agree this is working because we are seeing far less dead floating striped bass during this time when we are working on the water especially after the weekend.

We are currently experiencing a abundant and very healthy stock of striped bass and are having to set less gear to catch our allowed quota.

We strongly feel that thru continued recreational Conservation Equivalency we can meet our conservation goals for striped bass without further reduction in our commercial striped bass Quota.

Thank you for your consideration in this matter

Sincerely  
Samuel F Swann<sup>Jr</sup>  
commercial waterman

12100 Pennsylvania Farm Rd  
Newburg MD 20664

Email - SWANN CCI 5  
@ Verizon . net.

**USA**

"Peace through Strength..."

Emilie Franke

Atlantic States Marine Fisheries Commission

1050 N Highland Street. Suite 200 A-N

Arlington, VA 22201

March 17, 2022

Re ASMFC Draft Amendment 7

Dear sirs:

I wish to provide my written comment as required for your consideration.

Current state regulations have contributed to the collapse of the Atlantic Stripe bass population.

In MA, where a commercial harvest of breeding size bass continues, there is long term damage being done.

While I am encouraged that measures to provide more conservation are being considered, it's my belief that the draft amendment options are not adequate and, as presented for comment, far too complex.

I suggest that the obvious answer be considered – **make Striped Bass a Gamefish**. Place an immediate moratorium on any harvest be it commercial or recreational and permit only catch and release fishing until the stock rebuilds to a sustainable level.

If you think this is an over simplification that does not have merit, I suggest you learn about how well this has worked for redfish.

Your consideration of my suggestion is appreciated.

Richard Sargeant

A handwritten signature in blue ink that reads "R. Sargeant". The signature is written in a cursive style with a long horizontal stroke extending to the right.

38 Lakemans Lane

Ipswich, MA 01938

## Draft AMENDMENT 7 PUBLIC INPUT

Hello,

My name is Germain Cloutier. I am a Recreational Fisherman from Maine that fishes The entire east coast from Maine to New Jersey. Needless to say the Fishery has been in decline for some time now and I would recommend taking action to prevent further destruction of the fishery Stocks. Now while this Amendment is focused on Primarily Recreational Release mortality, It is VERY clear that there needs to be action to reduce harvest and Commercial Harvest, Immediately. Here is my Public input for the Current Proposed Amendment 7:

### Tier 1 option: Fishing Mortality Management Triggers:

#### Option A:

I support Sub option A.1( status quo). Reducing F to a level that is at or below the target within one year. This is very important since trying to manage fisheries is difficult, there needs to be continued quick action if needed.

#### Option B:

I Support option B.1.( status quo). If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under option A ( which should be one year). There still needs to be continues adaptation to the fishery as its being rebuilt.

#### Option C:

I support C.1( status quo) if F exceeds the F target for two consecutive years and female SSB falls below the SSB target in EITHER of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A ( status quo of 1 year is preferred)

### Tier Option 2: Female Spawning Stock Biomass (SSB) Management Triggers

#### Option A:

I support sub option A.2. Two Year deadline to implement a Rebuilding Plan the Board must implement a rebuilding plan within two years from when the SSB based management trigger is tripped. This is very important to keep action going if a trigger is tripped. We can not afford to delay action by the board when triggers are tripped.

#### Option B:

I support sub option B.1( status quo). If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within the timeframe. This Timeframe should be a lot shorter then 10 years.

#### Option C:

I support sub option C.1.( status quo). If Female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within the established timeframe.

### Tier Option 3: Recruitment Triggers

#### Option A:

I support sub option A.3. The Recruitment Trigger is tripped when any of the four JAIs used in the stock assessment model shows an index value that is below the median of all values in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years. There needs to

be severe action taken when there are bad spawns. These fish are so heavily pressured during spawning that any lucky enough to get to spawn need to continue to recruit for the future stock.

**Option B:**

I support sub option B.2: if the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if the F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year. This is VERY important to take a conservation minded approach when triggers are tripped.

**Tier Option 4: Deferred Management Action:**

I support Option A: No Deferred Management Actions. At this time there is No reason to defer actions that are needed to rebuild the fishery.

**Measures to Address Release Mortality:**

**Option B: Effort Controls**

I support Sub Option B.2: NO Harvest Spawning Closure Required. Along with all Recreational Harvest being stopped for the fish to spawn, I would also recommend that the Board Consider applying that to the Commercial Sector as well.

**Option C:**

I support sub option C.1: Recreational anglers would be prohibited from using any device other than a non-lethal device to remove striped bass from the water. This is very important to cut down on fish stress and damage during fishing activities.

**Option D:**

I support Sub Option D.2: Recommend states to outreach to the public on handling striped bass for better releases. A requirement is not necessary because people may not listen to it in the first place and be a waste of resources unfortunately.

As far as Commercial Quotas, These should be reduced to help rebuild the stocks as well, And there should NOT be any Commercial Quota Transfers either.

**4.4.1 Recruitment Assumption For Rebuilding Calculator**

I support Option B: Rebuild Female SSB to the SSB target level by no later than 2029, This is a more conservative approach and is needed at this time.

**4.4.2 Rebuilding Plan Framework**

I support Option B: this allows the board to move at a faster pace and get the Stocks back on track faster.

**4.6.2 Management Program Equivalency**

I support Option B Restrict the use of Conservation Equivalency Based on Stock Status

I support sub option B.1 Restrictions: CE programs should not be approved when the stock is below the threshold.

I support sub option B1-a: the stock is at or below the biomass threshold, CE programs would not be considered until subsequent stock assessment indicates stock biomass is above the threshold level.

I also Support sub option B1-b: The stock is below the biomass target, then CE programs would not be considered until biomass is above the target level.

I also Support B1-c: CE should not be allowed when overfishing is occurring



(Option B CE restrictions continued)

Sub Option B2. Applicability:

I support Sub option B2-a, I also support Sub option B2-b and also support Sub option B2-c: All recreational fisheries, bonus programs and Commercial fisheries should be restricted when stocks are indicated as overfished, or Overfishing is occurring.

Option C: Precision Standards for MRIP Estimates used in Conservation Equivalency Proposals

I support Sub Option C3: 30

Option D:

I support Sub option D3: 50 %

Option E:

I support Sub option E2: the percent reduction/liberalization projected for the FMP standard at the state specific level

In Closing, The board needs to take action to reduce Mortality to striped bass in the fastest way possible before it is too late. I believe that the board is taking the wrong approach in trying to reduce release estimated release mortality instead of cutting back hard numbers of Fish being Harvested. These fish need to be more protected and the fact that there is a price tag on striped bass heads, it promotes poaching and illegal activity. I hope one day Striped Bass will achieve Gamefish Status and be more protected. These fish are worth A LOT more alive then dead. Thank you for your time and I hope the board does what is right for the Fish!

Thank You,



Germain Cloutier

~~Stripedbassking@yahoo.com~~

stripedbassking@yahoo.com

March 25, 2022

Emilie Franke  
Fishery Management Plan Coordinator  
Atlantic States Marine Fisheries Commission  
1050 North Highland Street  
Suite 200A-N Arlington, Virginia 22201  
comments@asmfc.org (subject line: Striped Bass PID)

**Subject: Striped Bass PID/ Amendment 7**

Dear Ms. Franke

I have been fishing the beaches of Long Island for my whole life and as an adamant surfcaster for more than 30 years. Knowing what I know now I truly feel the ASMFC have let us down. In my opinion and from what I know and see we are in deep trouble. I am 75 years old and what has been done and what the ASMFC plans on doing in the future I feel will not bring this fishery back in my lifetime. Having said that these are my selected options for the public information document.

**Tier 1 – Timeline to Reduce F to Target**

I select **Sub Option A1**, Reduce F to a level that is at or below the target within one year

I select **Sub Option B1**, which is status quo from Amendment 6, and keeps the Threshold Trigger at 1-year for F exceedance for management actions to be considered.

I select **Sub Option C1**, which allows for quicker management actions to be taken when faced with F exceedance.

**Tier 2 – SSB Triggers**

I select **Sub Option A2**, which requires the Commission to issue a rebuilding plan within two years if a SSB trigger is tripped.

I select **Sub Option B1**, which is a status quo option that keeps the SSB Trigger set at “if the SSB drops below the threshold, the management plan must be adjusted within an established time-frame”.

I select **Sub Option C1**, which states that trigger for SSB Target would be 2 years of falling below the target to require management action.

**Tier 3 – Recruitment Triggers**

I select **Sub Option A2**, as it seems to be the most reasonable option. This allows for the trigger to be placed at a meaningful level, so as to enable the managers to take corrective actions, in the event that the fishery suffers poor recruitment, while the fishery is in an overfished state.

I select **Sub Option B2**, as I believe that it allows for a properly conservative response to low-recruitment data.

#### **Tier 4 – Deferred Management Action**

I select **Option A**. With declining striped bass abundance over the past 15 years, we can't be allowing for options that would defer action. The time for that has passed. The need for Amendment 7 should be proof of it.

#### **Recreational Management Measures**

I select **Option B2-a**, which would mean no harvest of bass in spawning areas from January through April. This would have a great effect on the fishery, while not a burden to fishermen, who, in my experience, get more enjoyment from catching the fish than eating them.

I select **Sub Option C-1**, which would outlaw the use of gaffs on Striped Bass.

On **Option C 2**, Circle hooks, It is just plain dumb and serves no purpose at all. Hard to enforce and appears to be blowing smoke where I rather not mention.

I select **Option D2**, which recommends to states to do outreach and education on proper fishing and handling of fish practices. I think it too burdensome to "require" states to do such programs and also will cost them financially.

#### **Rebuilding Plan**

I select **Option B** because by using an assumed low recruitment regime, we can offset issues where F is not accurately being identified.

#### **Rebuilding Plan Framework**

I select **Option B** because it allows for quicker action by the commission in the event that the 2022 stock assessment results show that this is needed.

#### **Management Program Equivalency**

I select **Option B1-a**, as I believe this makes the most sense. When the fishery is at or below the biomass threshold.

I select **Option C**. MRIP data should not be usable in coming up with Conservation Equivalencies, in cases where the Standard Error is above 30%.

I select **Option D2**. It is practical and "careful" to require a 25% uncertainty buffer in proposals for CE.

Sincerely

Lenny Ferro  
103 Stevenson street  
Lynbrook, NY 11563  
(516) 596-0735

RECEIVED APR 12 2022

Carlos J. Galarce  
36 Hillside Road  
Rockaway, NJ 07866

April 10, 2022

Emile Franke  
Atlantic States Marine Fisheries Commission  
1050 N Highland St., Suite 200 A-N  
Arlington VA 22201

Re: ASMFC Draft Amendment 7

Dear Mr. Franke;

This letter is being sent to support the following options to Amendment 7 of the ASMFC Striped Bass Management Plan. I have been a recreational fisherman for striped bass for over twenty years. I fish the beaches at Cape Cod both bay and ocean. During this period there has been a precipitous decline in both the number and size of fish. Whatever has been done in the past has failed (epically) to reverse the state of the stiped bass fishery. Please note that I support the following options to Amendment 7.

Tier 1 Options

Option A: Timeline to Reduce Fish Mortality Rate I support Sub-option A to reduce fish mortality.

Option B. Fish Mortality Triggers, I support Sub-Option B1 to reduce fish mortality in the event target threshold is exceeded.

Option C: Fish Mortality Triggers. I support Sub option C1 to adjust the fish mortality target if studies indicate that the target is not being met for two consecutive years and there is a decline in the spawning stock biomass.

Tier 2 Options

Option A: Deadline to Implement a Rebuild Plan. I support Sub-Option A2. There is no reason not to implement a rebuilding plan within two years. Without a deadline the commission will delay doing its job.

Option B: Spawning Stock Biomass. I support Sub-option B1.

Option C: Spawning Stock Biomass> I support Sub-option C1. It forces the commission to act if studies show that the striped bass biomass is continuing to decline.

### Tier 3 Options

Option A: Recruitment Trigger Definition. I support Sub-option A3. The current trigger is too liberal in its assessment of striped bass stock. It needs to be adjusted.

Option B: Management Response to Recruitment Trigger. I support Sub-option B2. The commission needs to be more responsive in the event a trigger is tripped.

### Tier 4 Options

I support Option A: no Deferred Management Action. In the event there is a management trigger which is tripped the commission needs to act on it immediately. You can no longer afford to simply wait set period of time simply before taking action.

4.2 Recreational Fishery Management Options: I support Sub-option B2.-b. All fish and game management benefit from a "closed" season during spawning or mating seasons. Striped bass are no different. It's a no brainer.

4.2 Recreational Fishery Management Options: Additional Gear Restrictions. I support Sub-option C1 and C2. The benefits are obvious and there is no downside to either one.

4.3 Outreach and Education. I support Sub-option D1 in that it requires states to at least attempt to educate the public.

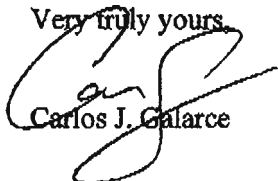
4.4-1 Recruitment Assumption for Rebuilding Calculation: I support Option B. The fishery needs to be restored to a target level that is robust.

4.6. Alternate State Management Regimes. I support Sub-option B1. Conservation Equivalency does not benefit the fishery. Its use should be eliminated but since you choose not to do so it should be restricted.

4.6.2 Management Program Equivalency I support Sub-option C3, D3 and E2 believing it is best to err on the side of caution given that stakes involved.

Please do your job which is to protect the species. Thank you for your consideration.

Very truly yours,



Carlos J. Galarce

March 6, 2022

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

Dear Emilie,

I am the founder of the Connecticut Catch and Release Fly Fishing Facebook group which has 1,300 active members. We are a conservation-oriented group that practices catch and release. For years we have been concerned at the depletion of the striped bass fishery and the ASMFC's slow response to what the science has been telling us.

We see striped bass as the flagship saltwater species. We are hopeful that the Striped Bass Management Board will adopt the options which compel the Board to quickly take effective action when the science indicates that action is required. The following are the options recommended by the Connecticut Catch and Release Fly Fishing Facebook group:

- |   |  |
|---|--|
| <b>4.1 Management Triggers:</b>             | Tier 1: <ul style="list-style-type: none"><li>- Option A1</li><li>- Option B1</li><li>- Option C1</li></ul> Tier 2: <ul style="list-style-type: none"><li>- Option A2</li><li>- Option B1</li><li>- Option C1</li></ul> Tier 3: <ul style="list-style-type: none"><li>- Option A3</li><li>- Option B2</li></ul> Tier 4: <ul style="list-style-type: none"><li>- Option A</li></ul> |
| <b>4.2.2 Recreational Release Mortality</b> | <ul style="list-style-type: none"><li>- Option A</li><li>-</li><li>-</li><li>- Option C1</li><li>- Option C2</li><li>- Option D1</li></ul>   |
| <b>4.4.1 Rebuilding Plan</b>                | Option B   |
| <b>4.4.2 Rebuilding Plan Framework</b>      | Option B   |
| <b>4.6.2 Management Program Equivalency</b> | <ul style="list-style-type: none"><li>- Sub-Option B1a</li><li>- Sub-Option B1c</li><li>- Sub-Option B2b</li><li>- Sub-Option C3</li><li>- Sub-Option D3</li><li>- Sub-Option E2</li></ul>   |

I appreciate your time and attention.

Sincerely,



Phil Sheffield  
Connecticut Catch and Release Fly Fishing Facebook group  
Contact info...

April 11, 2022

4.1

Tier 3

Option A: Sub-Option A2

Option B: Sub-Option B2

Tier 4

Option A: Status quo

Tier 1

Option A: Sub-Option A1 status quo

Option B: Sub-Option B1 status quo

Option C: Sub-Option C1 status quo

Tier 2

Option A: Sub-Option A2

Option B: Sub-Option B1

Option C: Sub-Option C1

No mansplaining. Rather, Thank you for all you do for the environment. Yours faithfully,

Ray Mendez Life member: TU, Housatonic Flyfishers Assn, Fla Keys Guides Assn, Henry's Fork Flm, FFF

Dear Ms. Franke,

Regarding Amendment #7 of the FMP, I support:

- Option B: Sub-Option B1-a
  - Option C: Sub-Option C3
  - Option D: Sub-Option D2
  - Option E: Sub-Option E2
- } 4.6.2

• Option B, 4.4.1

• Option B, 4.4.2

• 4.2.2:

- Option C: Sub-Option C1

- Option C: Sub-Option C2

- Option D: Sub-Option D2

Member:

BITA

TRCP

ASF

PF & QF

RGS / American Woodcock

NYC Audubon

Theodore Gordon Flyfishers

Past member:

Golden Gate Angling & Casting Club

Sangre de Cristo Flyfishers



Central Park Conservancy  
[centralparknyc.org](http://centralparknyc.org)



Public Comment on Striped Bass Draft Amendment 7

From Joseph Murrell (New York) via phone to Emilie Franke (ASMFC) on March 2, 2022

Mr. Murrell is a charter captain from New York and provided the following comments via phone:

There are more striped bass in the Hudson River now and it would be wrong to close the Hudson River fishery. 90% of people fishing for striped bass on the Hudson aren't keeping any fish they catch. The Hudson River fishery is not the problem and should not be closed. Massachusetts is taking a ton of striped bass and managers should stop the commercial fishery.

**240 Catherine Street  
Buchanan, New York 10511**

February 15, 2022

Ms. Emile Franke  
Atlantic States Marine fisheries Commission  
1050 N. Highland Street, Ste. 200A-N  
Arlington, VA 22201

Dear Ms. Franke:

Re: Draft Amendment 7

I am a lifetime Hudson River recreational fisherman who fishes yearly. I am 86 years of age and have seen many changes in the Hudson over the years.

Years ago someone changed the rules on the length and quantity of the striped bass a fisherman was allowed to keep. I believe this was detrimental to the fishermen and to the health of the river.

On my yearly jaunts to the Hudson to fish for white perch, I have been catching an over abundance of 3 and 4 inch striped bass. I recommend that you do further research on this topic before the striped bass eat everything in the river!

**I URGE YOU, DO NOT PASS DRAFT AMENDMENT 7.**

Sincerely,

John T. Tangen

A handwritten signature in black ink that reads "John T. Tangen". The signature is written in a cursive style with a large, looping initial "J".

**William A. Muller, Ph.D.  
183 Oakside Drive  
Smithtown, N.Y. 11787  
631-361-3366**

**February 28, 2022**

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

**Dear Emilie;**

I am writing to offer comments on the proposed **Amendment 7 for striped bass management**. As a marine scientist and recreational angler, I have been concerned for decades about a number of aspects of striped bass management that I believe have been somewhat over-looked. Yes, there have been some positive aspects of striped bass management, but that should not deter us from addressing other issues that have been over-shadowed by some success, or adjusting management to a more conservative position.

My concerns are a reflection of my experiences in the field as well as a scientist's ability to digest the history of management regimens. **First**, I have been, and continue to be, concerned about the response time when stocks decline. I believe it is much easier to quickly reduce the harvest and, should subsequent data reveal a more positive assessment, quickly make slight increases in allotments, as opposed to the long-drawn-out process of assessments and debates. In the present system any dominant year class continues to be harvested at rates appropriate to a higher population level. **Second**, although the total number of fish that die after catch and release is significant, I believe we spend too much time on this topic while totally ignoring the almost total mortality of druggers who target schools of striped bass in spite of the fact that druggers can only harvest a small "accidental" by-catch. Unfortunately, this behavior is directed and not accidental. Yes, we need to educate the recreational public about catch and release as well as institute reasonable rules to reduce recreational mortality. For example, I support the use of circle hooks. **Third**, I believe in an egalitarian approach to all fisheries management because fish are a common property resource. Smaller populations reduce the accessibility of fish to anglers who are limited to fish in certain locales where fish tend not to go when a population shrinks. Ranges of fish species retreat as population declines and expand, due to competition for space and food, when a population grows. Anglers who fish from piers, the surf, shallow estuaries, and creeks are typically bound to these areas for economic reasons, and are short changed when stocks are lower than historic levels. These include senior citizens, children (who lack mobility-cars and boats), and anglers from low socio-economic communities. **Fourth**, conservation equivalencies should not be part of any management scheme. Rules work best and are respected most when everyone lives under the same rules and restrictions.

I believe we can achieve reliable population stability with sound management, patience, and by establishing a more conservative management approach. We should manage for the species of fish and not for people. In the few cases where that has been done, populations expand and there are plenty of fish for all, and for longer periods of time.

My positions on options listed below reflect these opinions and concerns.

#### **4.1 Management Triggers**

##### Tier 1 Mortality Triggers

Option A1

Option B1

Option C1

##### Tier 2 SSB

Option A2

Option B1

Option C1

##### Tier 3 Recruitment

Option A3

Option B2

##### Tier 4

Option A

#### **4.2.2 Recreational Release Mortality**

Option A

Option B1: against

Option B2: against

Option C1

Option C2

Option D1

#### **4.4.1 Rebuilding Plan**

Option B

#### **4.4.2 Rebuilding Plan Framework**

Option B

#### **4.6.2 Management Program Equivalency**

Sub-option B1a

Sub-option B1c

Sub-option B2b

Sub-option C3

Sub-option D3

Sub-option E2

Thank you for considering my positions on striped bass management Amendment 7.

Respectfully

William A. Muller

Emile Frauke  
Atlantic States Marine Fisheries Commission  
1050 N. Highland St., Suite 2009 N  
Arlington, Virginia 22201

Feb. 20, 2022

Subject: Draft Amendment 7, Atlantic Striped Bass

Emile Frauke,

The following are some Striped Bass fishing concerns:

- \* The tidal Hudson, Striped Bass, recreational fishing area, spans from the George Washington Bridge to the Troy Dam. I believe the recreational fisherman regulations are much too stringent. Ask yourself, is it fun anymore to take the boat out for a few hours of fishing?
- \* I've fished the Hudson for Striped Bass since 1990 (31 yrs). There are many entities supported by the influx of fisherman during the spring spawn. The schools were large. However, most of the fish were released because of the pollution of the river due to P.C.B. contamination. It seems the recreational fisherman are being looked at for the reduction of the Bass numbers. There are other forms of fishing taking place at this time.
- \* The size restrictions and fishing methods are insulting. It's becoming a joke to go fishing.
- \* I'm all for preserving the habitat. When you talk about closing the spawning areas to fishing; this will limit the ability of the recreational fisherman to be successful.
- \* Release mortality is definitely a concern to all of us. The circle hook is not a cure all. You still have to know what you are doing; specifically matching the size of the hook to the size of the fish targeted. Fish mortality is still an issue.
- \* If you want to rebuild the stock, close the season for however many years it takes to accomplish the goal. This is heading toward catch and release.

*Jeffrey Pavia*

Jeffrey Pavia  
20 everett Rd.

Campbell Hall, New York 10916    Email: pavia@frontiernet.net

Craig A. McIlrath  
Recreational Surf Fisherman  
38 Mill Park Lane Marlton, NJ 08053  
[blandmail@comcast.net](mailto:blandmail@comcast.net)  
856-905-1711

To: Atlantic States Marine Fisheries Commission

Subject: Comments Regarding Draft Amendment 7 to the Atlantic Striped Bass Fishery Management Plan

Thank you for managing the striped bass fishery. Please accept my Draft Amendment 7 comments.

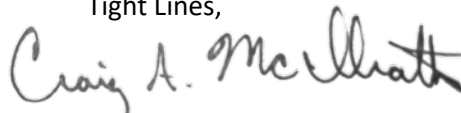
**Section 3.2 Recreational Catch and Landing Information** – MRIP data needs to be subjected to an Extended Peer Review prior to being incorporated in Striped Bass benchmark assessments. Bad MRIP estimates close seasons and cause regulation to tighten for no real reason. While MRIP statisticians show a collection of peer reviews by other statisticians illustrating the mathematical purity of the work; it often leads to estimates that couldn't possibly be true such as 2018 RI "Average" Shore caught stripers weighed 45.1 lbs.. An Extended Peer Review of MRIP is needed to also include Fishermen and Fisheries Scientists & Managers with real world knowledge of recreational fishing and catch in addition to the statisticians who created and reviewed it. Fishermen can easily identify instances of unbelievable Marine Recreational Information missed by statisticians and causing mismanagement of our recreational fish. It is not true in 2017 the "Average Size" of shore-caught stripers in CT was 19.6 lbs., MA 33.4 lbs. , and RI 33.8 lbs.

**Section 4.1 Management Triggers** – Liberalization Management Triggers also need to be defined. As is, this amendment assumes management will always continue to fail. Management cannot be allowed to ignore successes by failing to liberalize recreational fishing regulations when the science indicates liberalizations would be possible.

**Section 4.2.2 Measures to Address Recreation Release Mortality** –We no longer have the luxury to allow the experience of fishing for striped bass regardless of whether or not the fish is kept. It is not acceptable to kill fish for recreational sport. It is not acceptable to allow fisherman to go out and injure fish all day for pleasure. I recommend the following:

- 1) One fish bag limit, no size limit
- 2) Illegal to release any striped bass. No exceptions.
- 3) Illegal to engage in any fishing activity for any species after catching one striped bass. In other words four fisherman in a boat, 2 stripers in the cooler, 2 rods allowed in the water. I am fishing for blues is not a valid excuse.

Tight Lines,



Craig A. McIlrath

#### 4.2.2 Measures to Address Fish Mortality

We have made a mistake regarding mandatory use of circle hooks when fishing with bait for striped bass and I am asking you to please work to revise the provision to allow the proper use of J-hooks. The stated goal of requiring the use of circle hooks is to prevent/lower release mortality. My studies prove properly rigging j-hooks is more likely to prevent release mortality than improperly rigging circle hooks. Specifically, I am asking you to allow the use of J-hooks with bait when they are attached by a 2" line perpendicular to the main line, such as a high/low rig with 5/0 J-hooks attached to 2" dropper loops.

For 25 years I have conducted my own extensive j-hook study surf fishing with a dead stick and bait on the high low rig as described above and with baited (circle and j) hooks attached to long leaders. The problem is not with the shape of the hook but with the way the hook is rigged, specifically when the hook is attached to a long leader. My research finds this provision requiring the use of circle hooks and prohibiting the use of j-hooks with bait is fundamentally flawed in several ways. Do you know of any graduate students that could use this subject as a research topic to help further prove my assertions?

First, circle hooks attached to a long leader are gulped into a fish's internal organs and subsequently ripped back out again before engaging in the lip of the fish. The provision requiring circle hooks incorrectly assumes success by observing the desired end result of a lip hooked fish has been accomplished while completely ignoring the action of ripping the hook back out of a fish's internal organs. The action of ripping the circle hook back out of a fish's internal organs after it has been gulped into them, is more likely to cause fatal injuries than if the hook never entered the fish's internal organs in the first place. Use of circle hooks does not solve this issue. A better solution is one where the hook never enters the fish's internal organs at all.

Second, it ignores proper rigging of j-hooks always results in lip hooked fish and does prevent the hook from ever entering the fish's internal organs. The problem is not with j-hooks but rather with attaching j-hooks to a long line that is gulped directly into a fishes internal organs. Use of a high/low rig tied with 5/0 j-hooks attached to two inch dropper loops should be allowed, because it is the best way to prevent fish mortality. This rig prevents a hook from ever entering the fish's internal organs because the main line catches on the sides of the fishes lips. 25 years surf fishing with j-hooks in this manner I have always had lip hooked fish and NEVER HAD A GUT HOOKED FISH REGARDLESS OF SIZE OR SPECIES (e.g. striped bass, blue fish, drum, trout, fluke, sea robin, sand shark, skate, star gazer, king fish, bunker, spot, etc.).



***Lip hooked fish on J-Hook is not a Fluke***



I even catch double header blue fish on this rig because they are lip hooked and chomping on the hook shank and not the monofilament line. On the other hand I have lost countless fish using circle hooks on long leaders that fail to hook up. Those fish are likely injured, when the hook is ripped back out of its internal organs, without being caught with the chance of being kept.

This provision allows the use of treble hooks on plugs and metals because it is believed the angler is skilled enough to prevent gut hooked fish using actively fished lures. In the same manner I am asking for j-hooks rigged on short dropper loops to be allowed because they prevent fish mortality by ensuring lip hooked fish and do not rely on an angler's skill.

Thank You in Advance for Your Help,

*Craig A. McIlrath*

Craig A. McIlrath

38 Mill Park Lane Marlton NJ 08053

[blandmail@comcast.net](mailto:blandmail@comcast.net)

856-905-1711



**My Favorite!! Note Two Lip Hooked J-Hooks on High/Low Rig**

















To fend off comments regarding only small fish are shown above, I dug out this old picture.  
Note the red dot on the side of this fish's lip is where the J-hook was.

To Whom It May Concern:

I am a saltwater angler that lives in Connecticut that fishes the waters of Rhode Island, New York and Connecticut approximately 150 hours/year. It has been clear to me by the amount and size of fish that I have seen over the past 8 years that the striped bass stock is in trouble.

Therefore, I appreciate the opportunity to provide commentary on the proposed Amendment 7 to the ASMFC Atlantic Striped Bass Management Plan. I would like to express my support for the following options in the current Amendment 7 draft:

#### 4.1 Management Triggers

- Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality
- Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold
- Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions
- Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

#### 4.2.2 Measures to Address Recreational Release Mortality

- Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method
- Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

#### 4.4.1 Recruitment Assumptions for Rebuilding Calculation

- Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. We recognize this option may require more restrictive management measures than option A, which we support

#### 4.4.2 Rebuilding Plan Framework

- Option B to allow the Board to take direct management actions as well as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

#### 4.6.2 Management Program Equivalency

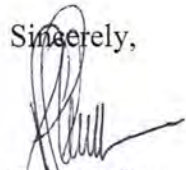
Per the Draft Amendment 7, “Management program equivalency (also known as “conservation equivalency” or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

I believe in restricting the use of conservation equivalency (CE) based on stock status.

- Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level
- Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates
- Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries
- Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

Thank you for providing the opportunity to comment on Amendment 7. I look forward to learning the outcome of the upcoming stock assessment and reading the final version of the Amendment.

Sincerely,



Peter T. Susca  
52 Hawthorn Way  
Wethersfield, CT 06109  
860-713-8050

Christfried Arfsten  
44 Clubhouse Drive  
Rocky Point, NY 11778

March 13, 2022

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

Dear Ms. Franke:

Before I respond to the options proposed in Amendment 7 of the Atlantic Striped Bass fishery Management Plan, I'd like to express some thoughts about the plan and the Atlantic States Marine Fisheries Commission.

I've been following the plight of the striped bass fishery since it was restored back in the mid 1990's. The actions of the ASFMC striped bass board to preserve and protect the striped bass stock over the past 10 years has produced undesirable affects due to inaction on their behalf. In 2011 they where informed that if no action was taken, the fishery would be overfished by 2017, which sadly became true.

What I think needs to happen is, the ASMFC needs to be more diligent in their fundamental function of preserving and protecting the striped bass fishery, including all of the fish that fall under their regulatory jurisdiction.

My thoughts on this are; an abundant striped bass fishery and all fisheries for that matter benefit everyone. The commercial and recreational people, the charter boats, the party boats, the tackle makers and the boat builders will all benefit from a robust fishery.

Finally, any diminishment in process to govern the reaction of the ASMFC to protect the striped bass fishery is a bad idea and I am only supporting the options that will at least retain the status quo, or will support a more robust fishery.

#### **4.1 Management Triggers:**

Tier 1-Fishing Mortality Management Triggers

- \* Option A1: the one-year status quo.
- \* Option B1: maintains the one-year status quo.
- \* Option C1: status quo option

Tier 2-Female SSB Management Triggers

- \* Option A2: 2-year deadline to implement a rebuilding plan
- \* Option B1: Status quo
- \* Option C1: Status quo



### Tier 3-Recruitment Triggers

- \* Option A3: Below median of all values for three consecutive years
- \* Option B2: Reduce F to target in one year

### Tier 4 Deferred Management Action

- \* Option A: No deferred action

### **4.2.2 Recreational Release Mortality**

- \* Option A: Status Quo (circle hook measures)
- \* Option B1: No – Effort Closures – State –Specific Two-Week Closures
- \* Option B2: No – Effort Closures – Spawning Area Closures
- \* Option C1: Yes – Additional Gear Restrictions – permit only non-lethal devices for removing fish
- \* Option C2: Yes - Additional Gear Restrictions –fish caught on any unapproved method must be returned to the water
- \* Option D1: Yes – Outreach and Education – States required to develop public education and outreach campaigns

### **4.4.1 Rebuilding Plan**

- \* Option B: Assumption for Rebuilding – Use low recruitment regime assumption.

### **4.4.2 Rebuilding Plan Framework**

- \* Option B: Permit Board to take action in response to 2022 benchmark assessment without having to go through an amendment or public comment period

### **4.6.2 Management Program Equivalency**

- \* Sub-Option B1a: Restriction – stock is at or below the biomass threshold
- \* Sub-Option B1c: Restriction – fishing mortality is at or above the fishing mortality threshold
- \* Sub-Option B2b: Applicability: Quota managed recreational fisheries
- \* Sub-Option C3: Precision Standards for MRIP Estimates – 30
- Sub-Option D3: CE Uncertainty for non-quota managed fisheries – 50%
- \* Sub-Option E2: Percent reduction at the state-specific level

Sincerely,



Christfried Arfsten



## Response to Draft Amendment 7

ASMFC Members,

My name is Jason Avila. I am resident of Massachusetts and a recreational fisherman. I appreciate the work being done by the commission and the opportunity to provide feedback on the management questions for the preservation of this important species. Recent declining trends in all stock metrics are extremely troubling indicators of the health of this species and the marine ecosystem in general.

At this time, the #1 responsibility of this commission (as related to the Atlantic Striped Bass FMP) is to rebuild the stock by 2029 as dictated by tripping the management triggers in 2018. A failure to produce this mandated outcome would greatly call into question the motives and capabilities of this commission to successfully manage the fishery. Action is required now, up to and including, a complete "No Target" strategy, to attain this paramount goal. I applaud the commission for putting forth this amendment to alter the management strategy to produce an abundant, sustainable population now and for generations to come.

The following are my thoughts on the topics in question:

### 4.1 - Management Triggers

#### Tier 1 Options : Fishing Mortality (F) Management Triggers

##### Option A : Timeline to Reduce F to the Target

I support the status quo (A1) to reduce F within one year. Any delay in the timeline to reduce F is counterproductive.

##### Option B : F Threshold Triggers

I support the status quo (B1) to reduce F within one year aligning with Option A.

##### Option C : F Target Triggers

I support the status quo (C1). Waiting until additional data is collected and averaged creates a situation where needed action is potentially delayed. Removing F target as a trigger would be a mistake.

#### Tier 2 Options : Female Spawning Stock Biomass (SSB) Management Triggers

##### Option A : Deadline to Implement a Rebuilding Plan

I support sub-option A2 to implement a two year deadline to implement a rebuilding plan. The status quo with no deadline potentially allows for delaying the implementation of a management plan until it is too late to attain the ten year deadline. As I stated in my opening this would constitute the most egregious dereliction of duty for this commission.

##### Option B : SSB Threshold Trigger

I support the status quo (B1) to implement a management plan to rebuild the biomass in line with Option A on a two year timeframe.

##### Option C : SSB Target Trigger

I support the status quo (C1). Similar to Tier 1 Option C, waiting until additional data is collected and averaged creates a situation where needed action is potentially delayed. Removing SSB target as a trigger would be a mistake.

#### Tier 3 Options : Recruitment Triggers

##### Option A : Recruitment Trigger Definition



I support sub-option A3 for the trigger to be tripped if any of the four JAIs falls below the more recent time series reference levels. The past decade plus has clearly shown a decline in the overall population but the existing triggers have never been tripped. This shows an overall ineffectiveness of the status quo and requires updating.

Option B : Management Response to Recruitment Trigger

I support sub-option B2 to create an interim F target using low recruitment assumptions. This approach will provide the solid benchmark for action and will remove the inactivity potential that is currently in place with the status quo.

Tier 4 Options : Deferred Management Options

I support the status quo of Option A which provides no options for deferring management actions for any reason. I can understand that board would like to provide a reliable, stable management plan but inactivity is too risky to the population to justify deferment.

4.2.2 - Recreational Release Mortality

Option A - Status Quo (Addendum VI circle hook measures)

I am in continued support of circle hook mandates.

Option B - Effort Controls (Seasonal Closures)

I support sub-option B1-b with a minimum of 25% directed trips being affected. With this Option I also support Tier B which mandates additional closures on top of current no-targeting closures. While I am aware of the potential problems with enforcement and bycatch, legitimate anglers will respect these regulations and for that reason feel this is the prudent option.

Option C – Additional Gear Restrictions

I support both sub-option C1 and C2 for the use of non-lethal devices and return of any fish taken with unapproved methods. Both of these measures are appropriate to comply with the overall goal of safe release techniques and lowering incidental mortality.

Option D – Outreach and Education

I support option D1 to mandate the development of public education and outreach campaigns. Too many anglers are unaware of the factors that increase mortality and I believe when equipped with more knowledge these anglers will comply with the recommendations that will lower incidental mortality.

4.4 - Stock Rebuilding and Low Recruitment

4.4.1 Recruitment Assumption for Rebuilding Calculation

I support Option B with the assumption of low recruitment regime to guide management decisions. This is the more conservative option and gives a better chance of meeting stated goals.

4.4.2 Rebuilding Plan Framework

I am strongly in favor of Option B to act as quickly as possible if the rebuild of the stock by 2029 is in question. The potential for bypassing the public comment period is less than ideal but is required to make quick and decisive actions to achieve protection of the fishery.

4.6.2 - Management Program Equivalency (Conservation Equivalency)

Option A Status Quo

I do not support the current approach.

Option B. Restrict the Use of Conservation Equivalency Based on Stock Status

I support B1-c. No CE if overfishing is occurring. I feel that when overfishing is occurring the use of CE is not appropriate.

Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals

I support option C3 where PSE cannot exceed 30%. MRIP already has many flaws and potential biases and I feel we need to limit the usage of any estimates when there is a high level of known uncertainty in them.

Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries

I support sub-option D3 where programs would be required to include a 50% uncertainty buffer. There are documented instances of states irresponsibly managing their CE efforts and there should be strong controls to ensure that the outcomes of CE are truly equivalent. I would also support hard reporting requirements for CE and strong penalties for failure to meet the CE goals.

Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries

I support sub-option E2 to require CE goals to be met a state-specific level. If states are implementing their own CE measures then they should be responsible to meet those goals in their fishery.

Thank you for the consideration,



Jason Avila

73 Dr. Braley Rd.

East Freetown MA 02717

**Christopher R. Palmer**  
**176 Gardnerville Rd**  
**New Hampton, NY 10958**

**March 23, 2022**

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

Re: Draft Amendment 7 public comment

Dear Ms. Franke, Commission Board, and Panels:

As a concerned recreational angler, I would like to share some information, observations, questions, and suggestions to possibly help sustain The Striped Bass Population in The Hudson River as well as other fisheries.

I have been fishing the Lower Hudson River, predominately out of Newburgh, NY for Striped Bass for over 25 years. I venture out in my boat each season beginning in the middle of April and then pack the fishing poles away around Memorial Day weekend (Striped Bass spawning season time frame).

In 2016 I started to log fish caught, released, and harvested on the boat. I took the data from total fish angled and divided the hours fished for each season. (See attached Exhibit A). The chart shows a slight declining trend line in fish being caught per hour. Noted, that this report tends to believe that there is a 6-year trending decrease in the population of Striped Bass in the Hudson River.

In reading the Atlantic States Marine Fisheries Commission's Draft Amendment 7, I have the following comments and questions:

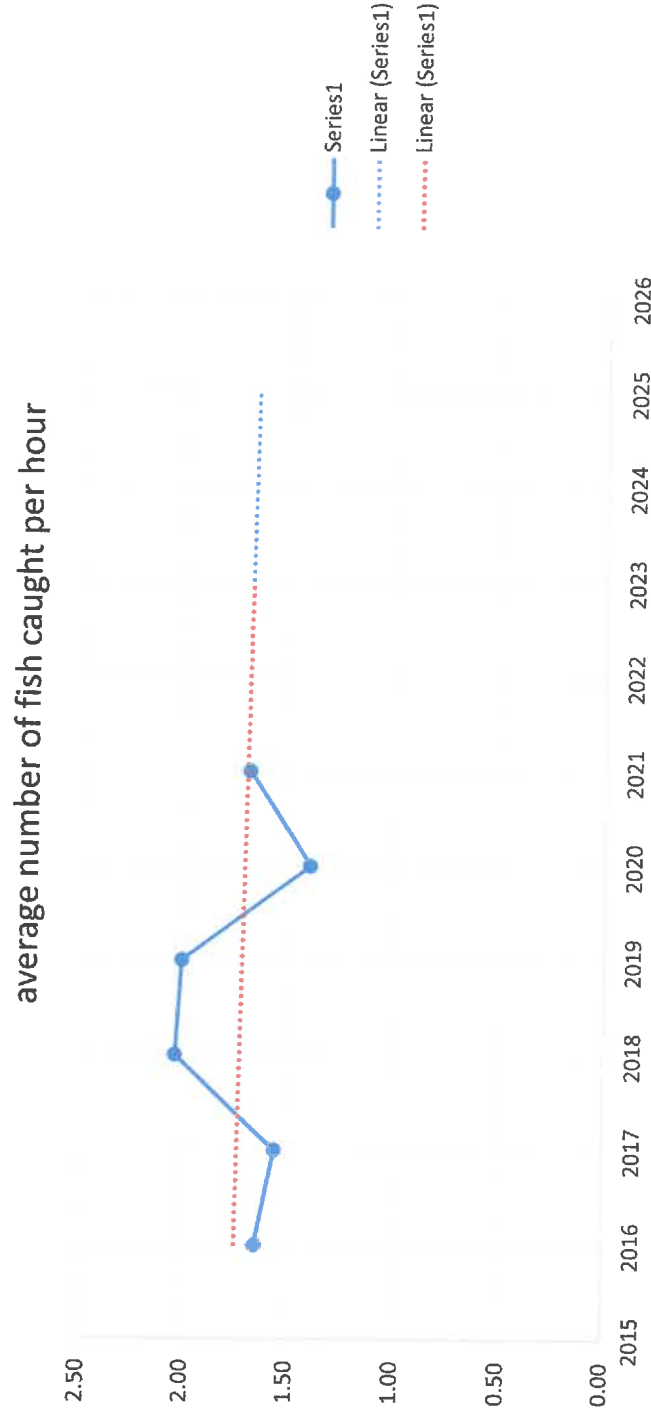
On page 11 section 1.3.2., it states that on average there is a 9 % mortality rate on fish that are caught and released recreationally. Based on my data from last year using the circle hooks, there were 13 gut hooks in which the line was cut without trying to remove the hook, 4 fish harvested, and 4 fish clearly deceased after trying to revive. Even though gut hooked fish were released lively, they are counted in the mortality count. 21 fish were considered deceased from a total of



Exhibit A

Striped Bass migration season # angler hours*	2016	2017	2018	2019	2020	2021
fish caught on boat	235.5	273.0	274.0	210.3	296.3	317.0
average # of fish caught per hour	1.65	1.56	2.04	2.01	1.40	1.69

# Season time frame was April through May . Fishing location was between Cold Spring, NY north to Marboro, NY  
 \*if there were 2 or more anglers on the boat the actual hours would be multiplied by 2



Six years of data shows a trend that is declining on the hourly count of fish caught.

536 caught on the boat in 2021. The mortality rate equates to 3.9% and this is including harvested fish.

Another observation that I see is that some anglers need to be educated on how to properly catch and release fish which contributes to the mortality rate. We should promote conservation agencies to educate anglers on proper catch and release with any species of fish. In similarity, when the agencies issue new hunting licenses, the new hunter is required education along with passing exams. This should also be done with anglers. Educate to minimize environmental impact on all fisheries. We as anglers have an obligation to respect and help the environment.

I believe that the study on the mortality rate for recreational anglers should be reevaluated especially now that the new circle hook requirement has been implemented. Furthermore, with more education the mortality rate can be reduced.

In reference to the Draft Document on page 51, figure 1 Juvenile abundances (JAI) charts from observation, the graph shows a correlation in NJ, MD, and VA from the 1980's to late 1990's with an increased abundance trend. 1990's to present it shows declining trends in MD and NY areas, but in the VA and NJ areas it looks like they have steady and sustainable trends. One question that comes from the data is why there are such high and low spikes in population from year to year (good and bad JAI's)? Also, why a negative correlation between each area in each year? For example, in 2020 the NY area had an increased abundance, whereas the MD area had a critical declining abundance. Is this discrepancy from areas mostly caused from Recreational angling (different restriction limits) or other factors such as weather and water conditions? Is there any data/evidence to show all the weighted factors needed for optimum peak conditions for a healthy production of yearlings?

In reference to page 59 through 63 in Draft Amendment 7 It discusses seasonal closures. In one extreme option it states the ability to totally close two weeks during the spawning season. I believe the recreational angler, guided fisherman, and local community would endure a highly negative economic and social impact in the regions that the "no fish" time would be enacted. How impactful is it to the Striped Bass population to close two weeks off when anglers already have prepared for for opening Day (April 1 in NY) then a few weeks later close? Are there other ways to minimize the impact of disturbing the spawning process?

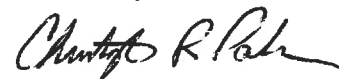


One suggestion would be to implement a maximum MPH limit with boat traffic, exclusive of commerce for the two weeks. From experience, the breeding stripers tend to get closer to the surface when it reaches time to spawn. They dart up to the surface regularly. During the prime spawning season when water temperature gets to around 59 degrees F. (in Newburgh NY), I will see over 50 boats fishing the river and many fish will break the surface to spawn. Some boat operators have no regard for boat etiquette and create huge wakes in the fishing area. I believe the fish are distracted and move on to quieter grounds. From my experience, when leaving the crowded spot and going to quieter grounds, the number fish caught will increase. One example for MPH restrictions is In the State of Florida. During migrating Manatee areas, the state will implement MPH restrictions on certain Areas. Boat traffic consideration should be looked at to minimize distraction of the spawning process when needed.

Other restrictions can be on angling gear. Currently in NY an angler can use up to three poles at a time with no more of a total of 15 hooks. Even reducing one pole and hooks will reduce catch release numbers. These considerations in lieu of closing the two-week season will not affect anglers and businesses as much. Anglers such as I want to be out on the water not only to fish, but to watch the amazing event of these fish when they surface for spawning.

Being an avid angler to Striped Bass, I try to keep an objective and unbiased outlook. We need to protect this great fishery along the US Eastern Seaboard. If we can respect and manage it through limited regulation, and not "no fish" provisions which deters current and future anglers with a healthy habit, hobby, and skill, we should be able to sustain a healthy environment for both fish and society. I hope you consider the comments and recommendations.

Earnestly,



Christopher R. Palmer

Emilie Franke

Atlantic States Marine Fisheries Commission

1050 N. Highland Street, Suite 200 A-N

Arlington, VA 22201

Dear Emilie,

Please find below the options presented in Draft Amendment 7 that I support.

My input is focused on requiring the Board to act quickly when the science indicates the stocks are not within target values. Due to a lack in trust that the Board will take the required actions in the future to maintain striped bass within target values my option selections are selected to limit the Boards discretion to get around taking needed action in a timely manner.

While I understand that some of my selection may have issues trying to enforce, it was noted at one of the ASMFC law enforcement committee meetings I attended that just making something a regulation you will usually get 80% compliance.

#### 4.1 Management triggers:

Tier 1 Options: Fishing Mortality (F) Management triggers

Sub-option A1

Sub-option B1

Sub-option C1.

Tier 2 Options: Female Spawning Stock Biomass (SSB) Management triggers

Sub-options A2

Sub-option B1

Sub-option C1.

Tier 3 Options: Recruitment Triggers

Sub-option A3

Sub-option B2.

Tier 4 Options: Deferred Management Actions

Option A.

#### 4.2.2 Measures to Address Recreational Release Mortality

Option A.

Sub-option B1-a

B2-a

Sub-option C1

Sub-option C2

Sub-option D1

4.4.1 Recruitment Assumption for Rebuilding Calculation

Option B

4.4.2 Rebuilding Plan Framework

Option B

4.6.2 Management Program Equivalency

Sub-option B1-a

Sub-option B1-c

Sub-option B2-a

Sub-option B2-b

Sub-option C3

Sub-option D3

Sub-option E2

Sincerely

Michael Toole

toolemf@hotmail.com

16 Raeder Drive

Stratham, NH 03885

Dominick L. Pucci, PhD  
Pemaquid, Maine  
March 24, 2022

Ms. Emilie Franke, Fishery Management Program Coordinator  
Atlantic States Marine Fisheries Commission via Email

Dear Emilie:

I'd like to thank you and all your colleagues at ASMFC for the concise and well-prepared Striped Bass Draft Amendment 7 presentation webinar last night. That work distilled what is a very convoluted and didactic bureaucratic document into something everyone can easily understand, allowing them to make informed decisions. Brava to all of you!

After last night session, I realized that my March 6 letter sent to the ASMFC comment's email was deficient in detail, although the sentiments were consistent, although understated, with the ones that I felt after last night's meeting. Therefore, I'm writing this "Amendment" to my original letter for inclusion into the file. Of course, please feel free to toss my other letter and replace it with this one if you're allowed to.

First, the basic info. I'm a retired biotechnology scientist who grew up on Long Island, NY, now retired on Maine's Midcoast. Striped Bass have been an obsession with me since I was 10 years old and earned the dubious distinction of being cited in my Doctoral Dissertation as a hinderance to my academic pursuits. Since my retirement 13 years ago, I have been able to fulfill my lifelong ambition of fishing any day I desire too, which translates to over 100 striped bass trips per year. The quest for this fish is one of my primary *raison d'être*.

Although I have enjoyed great fishing success over the past 7 years up here in Maine, the inner scientist forces me to look at all available data, and the 2018 Benchmark Stock Assessment revealed some troubling trends that demand strong fisheries management measures be swiftly enacted lest we witness a second crash in the striped bass fishery, an event that I never want to live through again. Towards that end, here are my updated, formal responses to ASMFC's request for comments on the Atlantic Striped Bass Draft Amendment 7.

#### **SECTION 4.1: Management Triggers:**

- **Tier 1: F1 Triggers**
  - **Option A1**, the *status quo* of reacting to a F trigger is tripped within 1 year is the ONLY option. We cannot tolerate the additional delay that Option A2 would allow.
  - **Option B1**, also the *status quo* of considering the F Threshold triggered if F exceeds the threshold in the most recent year must also be maintained. The B2 option of doing a 2 year average is unacceptable
  - **Both Options C1 (SQ) and C2**, should be considered reasons for management action. Option C3 which does not assign a trigger related to the F target is unacceptable
  
- **Tier 2: SSB Triggers**
  - **Option A2**, which mandates a 2-year deadline in getting an action plan in pace MUST replace the old *status quo* which does not stipulate a deadline, a dangerous loophole.

- **Option B1** is the only option, we MUST have an SSB trigger for striped bass! The absence of a trigger related to the SSB threshold, Option B2, is unacceptable!
- **Options C1 (SQ) & C2** should be considered together as the most appropriate triggers. Option C3 is unacceptable as we must have a trigger tied to the SSB!
- **Tier 3: Recruitment Triggers**
  - **Option A3, the High Sensitivity Option** is the only option that should be considered. I'm glad we're finally adding the JAI as a trigger point, but extremely disappointed with the inclusions of Options A1 & A2 as discussion points, options with very low triggering history. The fishery is getting into trouble, only conservative options should be considered.
  - **Option B2, the Most Conservative Response** is the only option to be considered. I find the inclusion of Option B1, the *status quo*, where the Board reviews the recruitment trigger and determines appropriate action an insult, as the Board's historical response has been poor. Option B3, the moderately conservative response is another "kicking the can down the road" loophole that some states would love to continue to utilize.
- **Recreational Release Mortality**
  - **Option A, status quo**, circle hook requirement should be kept as is
  - **Option B1 Family** – Since I fish in an area with a very limited season, basically June – September, I'm not a fan, but would accept a **B1-a** seasonal closure if necessary. My biggest concern is that this would be an unenforceable regulation. Proposing unenforceable regulations is a poor way for ASMFC to show commitment to taking bold steps to protect the population of any fish. If this step was necessary, then it would suggest that the current no-targeting closures are ineffective and these states would have to implement additional no-targeting closures.
  - **Option B2 Family** – Targeting and harvesting striped bass on the spawning grounds during the spawn is just plain INANE and UNACCEPTABLE!! Both **B2-a** and **B2-b** should be implemented!! Look north toward Canada which severely restrict fishing and spawning areas with gear restrictions, and total fishing shutdowns for any species during a 5-day period that the fisheries biologists set. This shutdown is set up yearly, adjusted for each estuary when it has been determined that the spawn has begun, a great example of proactive protection of a species.
  - **Both Options C1 & C2** for Gear Restrictions should be mandated. This is a no-brainer and people who claim gaffing is a "non-lethal" method of removal should be gaffed in their *gluteus maximus* to see how they feel about its use.
  - **Option D1** for required Outreach is a noble goal. Hopefully education would cut down on folks kicking striped bass back into the water.
- **Rebuilding Plan Calculation Options**
  - **Option B**, the Low Recruitment Assumption, is the only way to go. Based on the lack of progress of the *status quo* rebuilding calculations of the past, we must be more conservative.

- **2022 Assessment Response Options**

- **Option B**, with the board taking action without public comment hearings as long as the Board will take ensure a public comment session during an appropriate Board Meeting.

- **Conservation Equivalency**

- **Board CE Options** – Not sure what to comment on here, it's good for the Board to have discretion, but the additional options listed below need to be used to limit the use of CEs across the coast. If the items below are met, then have at it.
- **Restriction on CEs:** All 3 options B1-a, B1-b, and B1-c need to be considered as reasons NOT to allow any CEs. Any problems with the fisheries health MUST trump the use of CEs.
- **Applicability of CEs:** Another sad statement, YES let's include stock status restrictions to the non-quota managed fisheries, along with the commercial fishery. All of these options, B2-a,b,c, should be subjected stock status restrictions!!
- **Precision Standards for MRIP Option C3:** Since your models are only as good as your data, it's time to increase the precision for MRIP and only use data with a maximum of a 30 PSE.
- **Option D1, 10% Uncertainty Buffer:** Another no brainer. Of course, IF there are Board members willing to risk their personal funds like IRAs, 401(k)s, etc. with strategies involving 25% or 50% uncertainty investments, I'd love to hear more. Board members must start to think of their actions in terms of how they make personal investments.
- **Option E2, the ONLY Option!!** How the Board can allow states to implement CEs that negatively impact the coastwide FMP is beyond my comprehension. Allowing these types of CEs reflect very poorly on the Board and ASMFC.

Well, I've ranted enough. ASMFC is reaching a tipping point on Striped Bass in terms of both the health of the fishery, and respect for the Board from the fishing community. The Board's actions to finalize and approve Amendment 7, along with the implementation of these measures, will be a pivotal test of their performance and relevance. Based on recent missteps and failures, Board members should start thinking along the lines of "Failure is NO LONGER an option", and take bold, conservative measures for the health of this fishery.

Once again, thank you for your excellent presentation and your patience in collecting our comments. If you need any further information or have additional questions, please feel free to contact me.

Yours truly,



Dominick L. Pucci, PhD

Cc – Patrick Keliher, Maine Department of Marine Resources  
Megan Ware, Maine Department of Marine Resources

My name is Philip Romano and at 63 years old, I have been fishing since 5. I fish recreationally, as a mate on a commercial Partboat, and I commercial pinhook for blackfish. In all of my fishing **endeavors**, be they for pleasure or profit, I am concerned above all with the wellbeing of the fishery. Monetary gain and fish for the table come in a very distant second. I believe the vast majority of fisherman, both recreational and commercial, recognize the value of the fishery and are willing to sacrifice now to preserve our fishing futures.

I urge you to take the options in Striped Bass Amendment 7 that provide the most stringent measures to ensure the steady growth of what currently appears to be a rapidly declining striped bass fishery. I support the issue sub options proposed by the NYCRF, as enumerated below.

I want ASMFC to adopt options that guarantee the fast and decisive action that will preserve the striped bass fishery for my grandchildren to enjoy.

Thank you,

Philip W. Romano

33-16 149<sup>th</sup> Place, Flushing NY 11354

Phone: (917) 561 9426

**4.1 Management Triggers**

*Tier 1-Fishing Mortality Management Triggers*

Option A1

Option B1

Option C1

*Tier 2-Female SSB Management Triggers*

Option A2

Option B1

Option C1

*Tier 3-Recruitment Triggers*

Option A3

Option B2

*Tier 4-Deferred Management Action*

Option A

**4.2.2 Recreational Release Mortality**

Option A

Option C1

Option C2  
Option D1

#### **4.4.1 Rebuilding Plan**

Option B

#### **4.4.2 Rebuilding Plan Framework**

Option B

#### **4.6.2 Management Program Equivalency**

Sub-Option B1a

Sub-Option B1c

Sub-Option B2b

Sub-Option C3

Sub-Option D3

Sub-Option E2



March 25, 2022

To the Atlantic States Marine Fisheries Commission:

I am a recreational angler that fishes for striped bass primarily in CT and MA. I have been fishing for striped bass for approximately 30 years. I have noticed a steady decline in the number of bass in the last 10+ years. It used to be possible to go to any shoreline in Southern New England and catch stripers. Now they are only found at prime locations. There also seems to be a lack of larger fish. This is very concerning and an indication that more needs to be done to protect this great species and ensure that they will still exist for our children. Below are my comments on the Amendment 7 draft.

#### **4.1 Management Triggers**

- Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality
- Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold
- Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions
- Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

#### **4.2.2 Recreational Release Mortality**

- Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method
- Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

#### **4.4.1 Recruitment Assumptions for Rebuilding Calculation**

- Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. We recognize this option may require more restrictive management measures than option A, which we support

#### **4.4.2 Rebuilding Plan Framework**

- Option B to allow the Board to take direct management actions as well as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

#### **4.6.2 Management Program Equivalency**

- Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level
- Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates
- Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries
- Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

Thank you for providing the opportunity to comment on Amendment 7 and to participate in the future of the striped bass fishery.

Zach Faucher  
Norton, MA

March 26, 2022

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

Dear Emilie,

I am writing in response to the Public Comment posting on Amendment 7. Thank you for this opportunity. I'm an avid (30+ days/year) striped bass fly angler, frequenting New Hampshire (my home state) and Maine, and occasionally visiting Massachusetts and Rhode Island. I'm also a scientist and educator, and an avid reader and learner, including learning about the multiple sources of pressure on striped bass as they spawn in and/or migrate through multiple states. The striped bass is a remarkable fish, with an iconic place in Atlantic-states' history, culture, and commerce. I want that tradition to continue. The health of the striped bass fishery depends on a coordinated and cooperative across-states effort. Compromises will be required for all involved, but compromises are far more acceptable than the eradication of striped bass. We shouldn't – either through inaction or delayed action - collude in writing the final chapter in the striped bass history book.

So it's for multiple personal and public citizenship reasons that I feel so strongly about rebuilding and sustaining the striped bass fishery. I hope you will read and consider a few of my thoughts on the four categories in Amendment 7. I've worked to make them brief:

*Management Triggers:*

- Because benchmark stock assessments and assessment updates produce data that trigger action, e.g., to determine and reduce overfishing and fishing mortality, managers need to be much more responsive to those assessments, and to be prepared to move *without delay* to take action, such as protecting a year class. The opportunity to protect the 2018 class appears to have been a missed opportunity due to delays.
- We shouldn't let that happen again. The sequence of triggering a response, deciding an action, and implementing that action needs to be done much more expediently.
- If I were to be voting across that tiers and options, my votes here would be to:
  - Keep the management triggers as they are but shorten the response times to triggers, e.g., 1 year versus 2 years.
  - Maintain a 2-year deadline to implement a SSB rebuilding plan.
  - Reduce fishing mortality in 1 year (which has been demonstrated), not 2 years.
  - Do not defer management action.

*Management Program Equivalency*

- Coordination across states in conservation efforts applies very strongly when it comes to the allowance of equivalencies.

- When the SSB exceeds the threshold for overfishing, please do not allow the use of an equivalency, at least until SSB dips below the overfishing level. (This is sub-option B1-a). We need to rebuild the stock *now*, and that will take a coordinated and consistent effort.
- I also strongly support Option E2, which, if I understand correctly, would set reductions in overfishing in a state-gauged manner (*not* the past standard 18.5% across all states). Reductions should be in line with the degree of overfishing that is occurring in *each* state.

### *Rebuilding Plan*

- I support Option B - once again, because we need to find every avenue to shorten response times, in this case for the time needed for rebuilding.
- If the American Saltwater Guide's Association's (ASGA's) take on this is correct, Option B would allow us to shorten our response time to action - by allowing implementation based on the upcoming 2022 benchmark stock assessment, without needing to go through a public comment period. In doing that we could achieve effective action by 2023. We could save a year, which matters.

### *Recreational Release Mortality*

- Recreational catch-and-release fishing does result in mortality, suggested to be approximately 9%. I believe this can be lowered further through educational efforts (anticipated data from Massachusetts *may* provide more evidence on this). Therefore I support sub-option D2 to support education on playing and handling fish in a way that would limit release mortality. As an educator and scientist, I would happily volunteer to participate in a state- or region-wide educational effort.
- I also support C1 and C2. That is, I agree with the ASGA's stance that gaffs should be replaced with rubber-meshed nets (C1), and that by-catch stripers caught on J-hooks should be released unharmed (C2).

Thank you for listening!

*Richard K. Fleming*

Richard K. Fleming, PhD  
P.O. Box 515  
Freedom, NH 03836  
401-378-7324

Dr. Philip M. Perrino, O.D.  
10 Grassy Hill Court  
Wallingford, CT

To the Atlantic States Marine Fisheries Commission-

Before indicating my specific preferences with respect to Draft Amendment 7, I want to share my appreciation for the opportunity to contribute to the ASMFC discussion of policy management of Striped Bass along the Atlantic coast. Unfortunately, I believe that the commission has been ineffective in upholding the public trust of responsibly managing the Striped Bass Fishery. In view of what the current data reveals regarding the state of the fishery and plummeting Striped Bass populations, I am very concerned -and regard it as preposterous- to consider any delays to implementing strong conservation measures.

The fishery is currently in a state of crisis. Certainly, with the primary responsibility of the commission to preserve and rebuild the depleted Striped Bass population, then options in A7 which delay decisive action are misguided. Anyone with an unbiased assessment of the data would realize that the time to act is now, but I'm afraid that competing motives, unrelated to what is best for the fishery and the public, are influencing decision making within the ASFMC. Specifically, short term commercial interests, which are frequently at odds with the commission's public trust, appear to be clouding policy decisions and compromising its ability to fulfil its duty. This is not only wrong but is profoundly short sighted. The economic impact of the recreational fishery, largely catch and release, vastly outweighs commercial kill interests. For example, the entire region was once a "destination location" specifically for the sportfishing related to the Striped Bass populations. People, and their money, would flood to the region to partake in the great fishing. Home purchases, home rentals, the restaurant industry, tackle shops and a multitude of other businesses benefit from the recreational influx of fisherman and their families. This is a benefit to the communities of the Atlantic coast. Commercial value of a striped bass is much less impactful and largely benefit the limited number of those partaking in them. If these interests didn't contribute significantly to the decline of the Striped Bass population then it would be a relatively moot point. But in my view this is not the case. Commercial interests create a disproportionately significant kill of fish and, again, do not provide a proportionate benefit. Similarly, those who business is to run head boats, etc., primarily do so to make money and often are more focused on this month's results than the health of the fishery long term. The destructive force that short term view of a small group of commercial interests can have on fisheries management decisions cannot be denied.

There are some fairly straight forward actions that the ASFMC can implement to reverse the current declining trends in the Striped Bass population:

1. Ensure that prompt management action, rather than delay or inaction, occurs at the first moments that data warns us of trouble.
2. Eliminate or restrict "conservation equivalencies": If they are not working – and they aren't – then they must be rejected, and areas which have participated in them should provide compensation for their failures.
3. Close the kill season for all breeding areas

With respect to Draft Amendment 7, I recommend:

On 4.6.2 Management Program Equivalency,

-Sub-option B1. Restrictions: CE programs would not be approved when Sub-option B1-a: the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

-Sub-option C3: CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30.

-Sub-option D3: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 50%.

- Sub-option E2: Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state-specific level.

4.1 Management Triggers: The years of failure of the ASMFC to meet needed mortality reductions and the resulting low biomass of fish and spawning stock requires aggressive management triggers, not delays, to avoid catastrophe and assure 'in time' reductions in excessive fishing mortality. I strongly advise the commission adopt the following sub-options under Option A:

-Sub-option A1 (status quo): Reduce F to a level that is at or below the target within one year.

-Sub-option B1 (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

-Sub-option C1 (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

-Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment.

Option B: SSB Threshold Triggers: Without a strong SSB there can be no consistent reproduction to rebuild and sustain this prized fishery.

-Sub-option B1 (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

-Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

Tier 3 Options: Recruitment is an essential element of rebuilding and maintaining the stock. The JAI provides a valuable tool for managing striped bass that is independent of overall stock biomass assessments. As such, the commission is required to adopt the following more sensitive triggers regarding low recruitment and preclude the excessively risky models which have led to the tragic management results we are currently facing:

-Option A -Sub-option A3: The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model (NY, NJ, MD, VA) shows an index value that is below the median of all values in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years. The high recruitment reference period used for this trigger may be adjusted as recommended by the TC during benchmark stock assessments. This trigger alternative has a higher sensitivity than both the status quo trigger and sub-option A2.

-Option B- Sub-option B2. If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

Tier 4 Options: -Option A (status quo): No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

#### 4.2 Recreational Fishery Management Measures

Option B Seasonal Closures: Allowing anglers to target fish, including catch and release, on their spawning grounds or areas where they congregate prior to spawning is both unsporting and unhelpful to the reproduction critical to rebuilding and maintaining stock biomass. Given the low recruitment we face, this practice along with commercial harvest in these areas cannot be supported. I advise:

-Sub-option B2-b. No-Targeting Spawning Closure Required: All recreational targeting of striped bass would be prohibited for a minimum two-week period on all spawning grounds (not necessarily the entire spawning area) during Wave 2 (March-April) or Wave 3 (May-June), as determined by states to align with peak spawning. States will determine the boundaries of spawning ground closures. Closures prohibiting recreational targeting on spawning grounds have already been implemented in Maine (Kennebec River), New Jersey (Delaware River), and Maryland (Chesapeake Bay) during part of Wave 2 and/or Wave 3.

Option C: Gear Restrictions: I fully support the following measures which limit unnecessary catch and release mortality as listed below:

-Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

-Sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

Option D: Education: I support state supported angler education to reduce unnecessary catch and release mortality as below:

-Sub-option D1: States would be required to promote best striped bass handling and release practices by developing public education and outreach campaigns. States must provide updates on public education and outreach efforts in annual state compliance reports.

#### 4.4 Rebuilding Plan

4.4.1 Recruitment Assumption: Young of year over the past 3 years has been well below average. I advise Option B which bases the rebuild of stock on a recruitment assumption that is more realistic with these poor year classes and will achieve a lower level of removals and appropriate restrictive management measures as opposed to the more suspect and highly risky options.

-Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

4.4.2 Rebuilding Plan Framework: The commission's legacy of inadequate and delayed action has contributed to the failed management of the striped bass stock. As such, avoiding delays and taking needed action as quickly as possible to rebuild is required to avoid a worsening situation. I advise:

- Option B: 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 recruitment assumption specified in Amendment 7) 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.

It is my hope that you will seriously consider the points and recommendations I have provided and I again, thank you for the opportunity to participate in the discussion regarding the important task of re-establishing our Striped Bass fishery.

Sincerely,



Philip M. Perrino, O.D.

March 28, 2022

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

Dear Emilie,

I am writing in response to the Public Comment posting on Amendment 7. I'm an avid striped bass fly angler, frequenting Massachusetts and Rhode Island. The striped bass is a remarkable fish, with an iconic place in Atlantic-states' history, culture, and commerce. I want that tradition to continue. The health of the striped bass fishery depends on a coordinated and cooperative across-states effort. Compromises will be required for all involved, but compromises are far more acceptable than the eradication of striped bass.

I feel strongly about rebuilding and sustaining the striped bass fishery. I hope you will read and consider a few of my thoughts on the four categories in Amendment 7:

*Management Triggers:*

- Because benchmark stock assessments and assessment updates produce data that trigger action, e.g., to determine and reduce overfishing and fishing mortality, managers need to be much more responsive to those assessments, and to be prepared to move *without delay* to take action, such as protecting a year class. The opportunity to protect the 2018 class appears to have been a missed opportunity due to delays.
- We shouldn't let that happen again. The sequence of triggering a response, deciding an action, and implementing that action needs to be done much more expediently.
- My suggestions are:
  - Keep the management triggers as they are but shorten the response times to triggers, e.g., 1 year versus 2 years.
  - Maintain a 2-year deadline to implement a SSB rebuilding plan.
  - Reduce fishing mortality in 1 year (which has been demonstrated), not 2 years.
  - Do not defer management action.

*Management Program Equivalency*

- Coordination across states in conservation efforts applies very strongly when it comes to the allowance of equivalencies.
- When the SSB exceeds the threshold for overfishing, please do not allow the use of an equivalency, at least until SSB dips below the overfishing level. (This is sub-option B1-a). We need to rebuild the stock *now*, and that will take a coordinated and consistent effort.
- I also strongly support Option E2, which, if I understand correctly, would set reductions in overfishing in a state-gauged manner (*not* the past standard 18.5% across all states). Reductions should be in line with the degree of overfishing that is occurring in *each* state.

*Rebuilding Plan*

- I support Option B - once again, because we need to find every avenue to shorten response times, in this case for the time needed for rebuilding.
- If the American Saltwater Guide's Association's (ASGA's) take on this is correct, Option B would allow us to shorten our response time to action - by allowing implementation based on the upcoming 2022 benchmark stock assessment, without needing to go through a public comment period. In doing that we could achieve effective action by 2023. We could save a year, which matters.

### *Recreational Release Mortality*

- Recreational catch-and-release fishing does result in mortality, suggested to be approximately 9%. I believe this can be lowered further through educational efforts (anticipated data from Massachusetts *may* provide more evidence on this). Therefore I support sub-option D2 to support education on playing and handling fish in a way that would limit release mortality.
- I also support C1 and C2. That is, I agree with the ASGA's stance that gaffs should be replaced with rubber-meshed nets (C1), and that by-catch stripers caught on J-hooks should be released unharmed (C2).

Thank you for your time!

James Zabilansky

108 Dana Rd.  
Oxford, Massachusetts  
01540

This is a follow up letter from going to the meeting last night in New Paltz In regards to the changes in the striped bass regs,

I tried my best to move forward with an open mind but I just can't agree with the fact that fisherman in the Hudson Valley may have to give up their family heritage and their right to fish for striped bass while the rest of the east coast already has more relaxed creel regulations .The regs that were put in place above the GW bridge along with rest of the east coast are working bigtime .Every year we are catching more adult breeding Bass. Not to mention all the smaller ones.

I really disagree with the data you bring to the table. first off the data is outdated ,its 4 years old. the regulation imposing that all fish over 28 inches including over 40 inch be released came in effect at that time .More time to collect new data is needed .

The implication that .09% of Bass released is way off .If that was true in the Hudson the river would be full of floating dead Bass ,that 's not the case. These fish are cold which makes them more hearty.\7

I have never seen any body any agency out there taking a census of the dead fish. The creel surveys are off . You can't trust fisherman to tell the truth.

Striped Bass are wild they don't go to the same place every year at the same time ,they follow the food source and natural conditions . If the people doing the counting don't find them there the hunt is not over. don't electroshoch in the Esopus creek at high noon with a lot of boat traffic and tell me the stocks are down, come back at midnight ,the results might surprise you.

I've been a charter captain on the Hudson for 16 years and been fishing on the Hudson for about 30. You can't take away my livelihood and close my season, especially with short notice,I have an obligation to my clients. If the season gets closed I can't just put them somewhere else the season is to short already.

We need to keep it open and use the Hudson as the template for educated conservation for the whole east coast to follow. The conservation efforts in the Hudson work , If the agencies had boots on the ground you would see that.

Let me ask you ,you target the recreational fisherman to make the sacrifices but the commercial guys get a pass. Think about the remailing mom and pop tackle shops that rely and need the bump to get by today.

You gotta get better data on our river, you go down to the raratan bay and there are tons of Bass there well into December. The head boats there are slaughtering them, They keep log books but they keep them all! I know I went on 5 trips there last fall. nothing is released.

Maybe if changes were made ,perhaps replacing the treble hooks on the trollers with downriggers to single hooks be imposed or full catch and release season on the Hudson ,most of my clients would be ok with that. I am glad we have a strict slot limit I hated killing big female fish every day.

I said it before and I say it again more time and accurate data is needed before you change the lives of a lot of people in the Hudson Valley. After all the slot limit size of 37 inch on the east coast states is only two years old .

the use of circle hooks in the river for cold lethargic fish is not a helping in the Hudson either. Cold fish are not aggressive for the most part and barely bite the baits I use ,I don't fish bloodworms I use herring.so I'm not in favor of that law.

Sincerely , George Murphy

[www.hudsonrivercharter.com](http://www.hudsonrivercharter.com)

# iFishMD.com

## Sport Fishing Charters

March 29, 2022

Re: Striped Bass Amendment 7

Attn: ASMFC Striped Bass Management Board.

As a fishing charter captain and sales representative for recreational fishing boats whose business success is dependent upon a viable and abundant striped bass fishery in the Chesapeake Bay, I submit my comments on the striped bass Amendment 7 in a much more simple way than presented or requested by the board. I hope the board takes this philosophy under strong consideration when making decisions on striped bass management as they address each portion of Amendment 7:

**In order to rebuild the striped bass stock I want the board to take MEASURABLE action that rebuild the stock with the most certainty while providing the greatest opportunity (number of days) to fish.**

This means do NOT focus on no-target regulations that cannot show measurable conservation credit and take away opportunity to fish. Instead, focus on reducing the harvest where mortality reductions can be quantified. I ask that you utilize slots, harvest closures, or size limit adjustments that will reduce the mortality to sustainable rate while providing the most days on the water to fish and combine with releasing fish. After all, during the “year class protection” discussion at the winter 2022 meetings, the TC noted that significant reductions in harvest only increase release mortality minimally. I do support educating the public in order to reduce release mortality rates..

As far as rebuilding success goes, I ask that the board severely limit the use of Conservation Equivalency when the stock is overfished or overfishing is occurring and implement actions with the best probability for success. I believe CE has been used by some districts to thwart taking meaningful and necessary reductions to maintain abundance. This has resulted in the need for more harsh and significant reductions in the future. Should a district feel the need to pursue CE in order to use the striped bass more beneficially to the area, a cushion of error of not less than 10% should be included in equivalent measures.

Striped bass rebuilding had been a prize for the ASMFC in the past. Unfortunately, it now has been a slow steering ship that fails to respond and protect the resource effectively. I hope the Striped Bass Board looks to other successful species management such as Red Drum for a better example of how to sustain and protect a viable fishery. We should not have reached this point! I am praying for a good stock assessment this fall!

Sincerely,

Capt. Greg Shute

To the Atlantic States Marine Fisheries Commission

I am commenting on the proposed striped bass draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass.

My name is Ben Horner, I live in New Hampshire and fish throughout New England, primarily for Striped Bass in the surf. I have included at the end of this letter, my preferred choices.

First, I would like to thank the moderators and agency representatives that ran the webinars. They were professional and kept the meetings on track, difficult to do with sometimes opposing viewpoints. I attended Maine, Maryland, and New Hampshire.

I find it perplexing that we have an agency, who's mission includes the safe keeping of the striped bass population (among many others), but we see the population crashing so much. What I understand is that the fishery is in trouble and has been for a long time. That should be the primary focus of Amendment 7. No fish means no fishermen, commercial or recreational. Regarding the Amendment 7 document. Please consider including an Executive Summary in the future. The document was difficult to get through on its own. Maybe we would have more feedback from the public if there was a summary.

The ASMFC has said that the public is losing faith in their ability to make swift, critical decisions based on science and public input. That says a lot on where the direction has gone in the past. I am hopeful the future sees more appropriate action. This is a chance to show that, we as a people can manage and grow a fishery. Here are a few bullets of what I believe should be considered.

- Manage the fishery for abundance and not for yield.
- I support very small commercial harvests and even smaller recreational harvests.
- Manage the "bait" fishery correctly, particularly Menhaden and Shad.
- I support short season closures if they are shown to be impactful.
- I don't see how Conservation Equivalency has done anything to help the fishery recover. It gives too few people the opportunity to steer the whole program to whatever they deem appropriate. Please consider this viewpoint.
- I think immediate and aggressive action from the ASMFC is required.

Thank you for the opportunity to comment, and hope that my voice will be heard, and we can save this important and beloved fishery.

Regards,  
Ben Horner  
Hooksett, NH

## **My Preferences:**

**Tier 1 Options:** Fishing Mortality (F) Management triggers (page 45 and 46)

**Sub-option A1**

**Sub-option B1**

**Sub-option C1**

**Tier 2 Options:** Female Spawning Stock Biomass (SSB) Management triggers (page 47)

**Sub-options A2**

**Sub-option B1**

**Sub-option C1**

**Tier 3 Options:** Recruitment Triggers (page 48-52)

**Sub-option A3**

**Sub-option B2**

**Tier 4 Options:** Deferred Management Actions (53 and 54)

**Option A - 4.2.2 Measures to Address Recreational Release Mortality**

**Option A** (see page 58 for details)

One of the issues noted with required use of circle hooks it is hard to enforce since someone using J hooks could just say they are fishing for blue fish. A suggestion would be to require circle hooks for all species regulated by ASMFC, at least above a certain hook size.

**Sub-option B1- A** but changing it to say no harvesting rather than targeting. This would be very difficult to enforce if targeting is used. Should get much of the expected results if harvesting is used. (page 60)

**B2-a**

**Sub-option C1** (page 64)

**Sub-option C2**

**Sub-option D1** (pages 64 and 65)

4.3.2.1 Commercial Quota Transfers (page 66)

Recommend current practice of no transfer.

4.4.1 Recruitment Assumption for Rebuilding Calculation (page 67 and 68)

**Option B**

4.4.2 Rebuilding Plan Framework (page 69)

**Option B**

4.6.2 Management Program Equivalency (pages 76-79)

**Sub-option B1-a**

**Sub-option B1-c**

**Sub-option B2-a**

**Sub-option B2-b**

**Sub-option C3**

**Sub-option D3**

**Sub-option E2**



## Atlantic States Marine Fisheries Commission's (ASMFC)

To Whom It May Concern:

My name is Gary R. Soldati and I am a plug maker and serious surfcaster. I would like to share with you my experience and recommendations for the recovery of the striped bass stocks.

In spring, 2012, on my annual week-long trip to Block Island, I noticed a significant decline in the fish landed during our trip. I chalked it up to a bad week of fishing. When this same scenario happened on subsequent yearly trips, I realized fishermen had a big problem. I was not the only one to experience this downturn in the stocks. Fishermen all along the Atlantic Coast buy plugs from me and they were experiencing the same poor fishing.

Having lived and fished through the last downturn of the stocks roughly 40 years ago, I was waiting for fisheries management to come to the rescue. The same scenario was playing out as years ago: there were some really big fish and a lot of smaller fish (the 1982 year class of stripers). Back then, management protected the 1982 year class of fish by raising the legal minimum limit you could keep a striped bass, each year successively raising the limit as that year class grew. The minimum length started at 28" and went all the way to 36." In New York waters in 1986 there was a moratorium for one year, originally the closure was due to high levels of PCBs, but was seen as a crucial step in the recovery process of the striper. Even commercial fishing was curtailed.

These management strategies were extremely effective and we returned to keeping one fish at 28" minimum to expanding to two fish at 28" in later years. These actions resulted in a vibrant fishery until 2012. Presently, as the stocks have declined, management has been slow to respond. They reduced the "retain limit" back to one fish, but this has had little or no effect on overall bass stocks.

So, we have a successful blueprint from 40 years ago and we are now, similarly, seeing a lot of smaller fish from the 2015, 2017 and 2018 year class. To which your response is a slot limit instead of a minimum limit that would increase as those year classes matured. Now those year classes are entering the slot and will be targeted and not protected. I feel a valuable resource – the pool of 2015, 2017 and 2018 fish – are being wasted. Your slot proposal targets these fish as they become active spawners. I recommend a minimum limit that increases annually as these year classes mature.

My second concern is the lack of any reduced take on the part of commercial fisherman. You don't deem this group as a problem, but I believe they are a problem nonetheless given the size of this sector and their methods of fishing. Are you able to calculate the catch and release mortality of commercial fishermen? I would love to understand your rationale for this decision beyond 'commercial fishing will not be addressed.' Without your rationale I am left feeling that there may be political motivations involved that favor the commercial sector. While this may be good for commercial fishermen, it is not good as a comprehensive solution to shrinking stocks of striped bass.

Also, unknown to many fishermen, there is no upper slot for commercial fisherman at least in Massachusetts. If they catch a fifty pound fish in Mass they can keep and sell that fifty pound fish. How is the slot limit protecting the fish in this instance?

With the stocks in trouble, we all need to suffer a little to spur a robust recovery. The commercial guys should not be getting a free ride.

I know my perspectives presented here are not part of Amendment 7, and are not currently being discussed, but they should be if we are going to recover and rebuild the stock in a reasonable time frame.

Thank you,

Gary R. Soldati  
[gary@bigwaterpikes.com](mailto:gary@bigwaterpikes.com)

To: ASMFC  
From: Richard E. Booth - Charter Captain & Striper Angler  
Re: Comments for Draft Amendment 7  
Date: March 25, 2022

Robert Boyle (The Hudson River) wrote” From the Atlantic and Pacific we have proof that the striped bass is a highly adaptable species, in the face of fiercest assaults, the striper has managed to survive. For that we must be thankful, but we must also recognise that there are lessons to be learned from the close calls the species has suffered.” Let’s not make this one of the close calls.

#### MANAGEMENT TRIGGERS:

- A. Fishing Mortality Triggers - Timeline to reduce F to Target, I support sub option A1 - status quo for one year.  
Support sub option B1 status quo for one year.  
F Target Support Sub- option C1 if F exceeds the F target for two consecutive years etc.

#### SPAWNING STOCK BIOMASS TRIGGERS

- A. Support a two year deadline re: a rebuilding plan- Sub -option A-2.
- B. SSB Threshold trigger - support sub - option B1 status quo.
- C. SSB Triggers - support sub- option C1.

#### RECRUITMENT TRIGGERS

- A. Support sub option A2 - moderate Sensitivity Recruitment Trigger.
- B. Support sub-option B2- program must be adjusted to reduce F with one year.

#### DEFERRED MANGAGEMENT PLAN

- A. Support Option A (status quo).

#### MEASURES TO ADDRESS RECREATIONAL RELEASE MORTALITY

- A. Support Option A.

#### GEAR RESTRICTIONS.

- A. Support sub-option C1 and Sub-option C2.
- ( Suggestion ) Only circle hook use for bait fishing AND ONLY SINGLE HOOKS ON ALL HARD LURES FOR TROLLING AND CASTING! NO USE OF TREBLE HOOKS WHILE STRIPER FISHING! ESPECIALLY FOR BAIT FISHING!!!!

#### OUTREACH AND EDUCATION

- I Support best handling and release of stripers to be promoted by all the States involved - Sub-option D2.

#### RECRUITMENT ASSUMPTION FOR REBUILDING CALCULATION -

- I support Option B - use of a low recruitment assumption for 2022 stock assessment.

#### REBUILDING PLAN FRAMEWORK

- I support option B to have ASMFC respond quickly through board action.

#### MANAGEMENT PROGRAM EQUIVALENCY I support Sub-options B1.

- Support Sub-option C3, Sub-option D2, and Sub-option E2.

Quoting H.G. Wells: “History becomes more and more a race between education and catastrophe.” I hope the ASMFC Board is on the side of education.

I would like to stress how important it is to have our DEC officers consistently visible on the water, we need more DEC staff patrolling our waters! Thank you!!



5 April 2022

Emilie Franke  
Fishery Management Plan Coordinator  
Atlantic States Marine Fisheries Commission  
1050 North Highland Street  
Suite 200A-N  
Arlington, Virginia 22201  
comments@asmfc.org (subject line: Striped Bass PID)

**Subject: Striped Bass PID/ Amendment 7**

Dear Ms. Franke,

I am Edward J. Messina, Ph.D. I am 85 years old, and have been surf fishing for striped bass for over 50 years. I have experienced the highs and lows of the fishery as well as the years when the moratorium was in place.

It is my opinion the ASMFC has failed in its duties and responsibilities to respond to the early warnings provided in and since 2006, by those of us that fish hard and are careful observers of what is going on in marine waters, regarding the striped bass fishery. Your reliance on data, based on dock and beach side surveys, was in our minds a joke. Yet, you made policy decisions on the bases of this bad data that has now brought us to the point, where the future of the striped bass fishery is in danger of disappearing. Given my age, and that of many of the seniors who I encounter on the beaches I fish (Cape Cod to the South and North Shores of Long Island) we do not have ten years left to wait for you to act in a timely fashion to bring the fishery back to what it was at its historical highs or at least to what it was in the late nineties.

Therefore, the purpose of this letter is to provide public comment regarding Draft Amendment 7, to the Interstate Fishery Management Plan for Atlantic Striped Bass, regarding the options I prefer and wish the Board would consider and adopt. I do not prefer any of the options that would delay the Board's action any more than what I have experienced in the past, that has to my and many fishermen being frustrated with the Board policy making and distrusting their true agenda.

THE PRIMARY AGENDA SHOULD BE TO MANAGE THE FISHERY TO ALLOW IT TO REACH A STATUS OF ABUNDANCE AND NOT WORRY, AT ALL ABOUT THE USER GROUPS. THE USER GROUPS WILL ALL BE SATISFIED WHEN YOU ACHIEVE THAT STATE BECAUSE THERE WILL BE A REASONABLE EXPECTATION THERE WILL BE ENOUGH FISH FOR EVERYONE!

I thank you in advance for forwarding the options I have selected below to the Board for their consideration.

Sincerely,

Edward J. Messina, Ph.D.

43 Schrade Road

Briarcliff Manor, NY 10510

### Tier 1 – Timeline to Reduce F to Target

I select **Sub Option A1**, which is status quo from Amendment 6, and requires a reduction of F to target level or below within one year. Why would you want to delay action when the fishery is in danger of collapse.

I select **Sub Option B1**, which is status quo from Amendment 6, and keeps the Threshold Trigger at 1-year for F exceedance for management actions to be considered. Other options would allow for delayed management actions. Again why would you want to delay action when the fishery is in danger of collapse.

I select **Sub Option C1**, which allows for quicker management actions to be taken when faced with F exceedance. By choosing any of the other options, we could be faced with a situation where the fishery continues to get abused for multiple years before action is taken. This would require future actions to be more painful to user groups than they need to be.

### Tier 2 – SSB Triggers

I select **Sub Option A2**, which requires the Commission to issue a rebuilding plan within two years if a SSB trigger is tripped. Other options would potentially delay recovery actions. This is the policy failure that has brought the fishery to its current state of potential collapse, a timely response is required not more delay.

I select **Sub Option B1**, which is a status quo option that keeps the SSB Trigger set at “if the SSB drops below the threshold, the management plan must be adjusted within an established time-frame”. Delaying action has proven to be a problem with management of Striped Bass, particularly given state by state politics involvement in the process.

I select **Sub Option C1**, which states that trigger for SSB Target would be 2 years of falling below the target to require management action. Once again, the other sub options seek to allow more time to pass for the managers to take action, which is counterintuitive to me.

### Tier 3 – Recruitment Triggers

I select **Sub Option A2**, as it seems to be the most reasonable option. This allows for the trigger to be place at a meaningful level, so as to enable the managers to take corrective actions, in the event that the fishery suffers poor recruitment, or while the fishery is in an over fished state.

I select **Sub Option B2**, as I believe that it allows for a properly conservative response to low-recruitment data. In the event that the fishery shows sufficient improvement, over time, I could support an addendum that would relaxed a bit (such as described in the other Sub Options).

### Tier 4 – Deferred Management Action

I select **Option A**. With declining striped bass abundance over the past 15 years, we can't be allowing for options that would defer action. The time for that has passed. The need for Amendment 7 should be proof of it. I am too old for delay.

### Recreational Management Measures

I select **Option B2-a**, which would mean no harvest of bass in spawning areas from January through April. This would have a great effect on the fishery, while not a burden to fishermen, who, in my experience, get more enjoyment from catching the fish than eating them. WE FISH FOR THE THRILL NOT THE KILL. Ninety five percent of the surf fishermen I fish with release their striped bass.

I select **Sub Option C-1**, which would outlaw the use of gaffs on Striped Bass.

Option C-2, I have no opinion on this option as I feel the use of circle hooks is difficult to enforce, and that, in some sense, the ASMFC has to manage the striped bass to account for and accept a certain degree of recreational mortality. As a responsible fisherman who almost never gut hooks fish, I want the freedom to fish with the hooks that I want to use. What do I do with all the hooks that I have already purchased at great cost. I believe education of the fisherman that use J style hooks should be attempted by the Board at the tackle shop level with flyers that urge fisherman to hold their rods when bait fishing with J hooks and to not spike them or leave them unattended.

I select **Option D2**, which recommends to states to do outreach and education on proper fishing and handling of fish practices. I think it too burdensome to “require” states to do such programs and also will cost them financially.

### **Rebuilding Plan**

I select **Option B** because by using an assumed low recruitment regime, we can offset issues where F is not accurately being identified.

### **Rebuilding Plan Framework**

I select **Option B** because it allows for quicker action by the commission in the event that the 2022 stock assessment results show that this is needed.

### **Management Program Equivalency**

I select **Option B1-a**, as I believe this makes the most sense. When the fishery is at or below the biomass threshold, states should not be allowed to toy around with their regulations. As history has proven, this is risky business.

I select **Option C**. MRIP data should not be usable in coming up with Conservation Equivalencies, in cases where the Standard Error is above 30%.

I select **Option D2**. It is practical and “careful” to require a 25% uncertainty buffer in proposals for CE.

Sincerely,

*Edward J. Messina*

Edward J. Messina, Ph.D.

43 Schrade Road

Briarcliff Manor, NY 10510

914-391-5803

Christopher M. Ursini  
33 Baker Drive  
Waterbury CT 06705

Date: April 6, 2022

Subject: Draft Amendment 7 of the Atlantic Striped Bass Fishery Management Plan

Dear ASMFC Commissioners,

In this letter, I provide my advisement to the commission on Draft Amendment 7 of the Atlantic Striped Bass Fishery Management Plan with the goals of not only rebuilding this once prized fishery but rebuilding the integrity of the ASMFC as well.

**4.6.2 Conservation Equivalency (CE):** Let me begin by addressing, CE, one of the key tools that has been weaponized by some member states to subvert ASMFC's fisheries management. Specifically, CE has been used as a conservation loophole by individual states with the result being failure to meet even the inadequate reductions in fishing mortality rate targets set by ASMFC and further depletion of the stock. New Jersey's CE in Amendment 6 is just the latest example of harmful use of CE and illustrates both the hazards (i.e. increased risk) and low predictability (i.e. high uncertainty) inherent with the use of state specific CE formulas. As such, the following options are amongst the most important for the commission to address excessive fishing mortality in Draft Amendment 7. I strongly advise the commissioners to adopt:

-Sub-option B1. Restrictions: CE programs would not be approved when Sub-option B1-a: the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

-Sub-option C3: CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30.

-Sub-option D3: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 50%.

- Sub-option E2: Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state-specific level.

**4.1 Management Triggers:** The years of failure of the ASMFC to meet needed mortality reductions and the resulting low biomass of fish and spawning stock requires aggressive management triggers to avoid catastrophe and assure 'in time' reductions in excessive fishing mortality. I strongly advise the commission adopt the following sub-options under Option A:

-Sub-option A1 (status quo): Reduce F to a level that is at or below the target within one year.



-Sub-option B1 (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

-Sub-option C1 (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

-Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment.

Option B: SSB Threshold Triggers: Without a strong SSB there can be no consistent reproduction to rebuild and sustain this prized fishery. Yet, the ASFMC has been unable to achieve even this most fundamental objective, in part, due to its repeated poor management practices. Adoption of the following options best address a foundational element of prudent stock management, that being the safeguarding of a strong SSB.

-Sub-option B1 (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

-Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

Tier 3 Options: Recruitment is an essential element of rebuilding and maintaining the stock. The JAI provides a valuable tool for managing striped bass that is independent of overall stock biomass assessments. Let me provide an example. Some fishers have claimed the striped bass stock has moved “off shore” and we are underestimating the stock biomass and should let the killing continue. However, all spawning fish must return to very limited breeding areas, primarily the Chesapeake Bay and Hudson River, to reproduce. The low JAI and young of the year indices of recent years provides additional strong evidence that the SSB is not sufficient for a healthy stock and that claims of “redistributed” biomass are either fanciful, anecdotal, or irrelevant. We must include strong reproduction, *per se*, as a key, independent, metric of the management plan. As such, the commission is required to adopt the following more sensitive triggers regarding low recruitment and preclude the excessively risky models which have led to the tragic management results we are currently facing:

-Option A -Sub-option A3: The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model (NY, NJ, MD, VA) shows an index value that is below the median of all values in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years. The high recruitment reference period used for this

trigger may be adjusted as recommended by the TC during benchmark stock assessments. This trigger alternative has a higher sensitivity than both the status quo trigger and sub-option A2.

-Option B- Sub-option B2. If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

Tier 4 Options: Inaction or deferring action when a management trigger is tripped is the hallmark of ineffective management and an example of another management failing that has plagued this commission. Accordingly, I advise:

-Option A (status quo): No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

#### 4.2 Recreational Fishery Management Measures

Option B Seasonal Closures: Allowing anglers to target fish, including catch and release, on their spawning grounds or areas where they congregate prior to spawning is both unsporting and unhelpful to the reproduction critical to rebuilding and maintaining stock biomass. Given the low recruitment we face, this practice cannot be supported. I advise:

-Sub-option B2-b. No-Targeting Spawning Closure Required: All recreational targeting of striped bass would be prohibited for a minimum two-week period on all spawning grounds (not necessarily the entire spawning area) during Wave 2 (March-April) or Wave 3 (May-June), as determined by states to align with peak spawning. States will determine the boundaries of spawning ground closures. Closures prohibiting recreational targeting on spawning grounds have already been implemented in Maine (Kennebec River), New Jersey (Delaware River), and Maryland (Chesapeake Bay) during part of Wave 2 and/or Wave 3.

Option C: Gear Restrictions: I fully support the following measures which limit unnecessary catch and release mortality as listed below:

-Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

-Sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

Option D: Education: I support state supported angler education to reduce unnecessary catch and release mortality as below:

-Sub-option D1: States would be required to promote best striped bass handling and release practices by developing public education and outreach campaigns. States must provide updates on public education and outreach efforts in annual state compliance reports.

#### 4.4 Rebuilding Plan

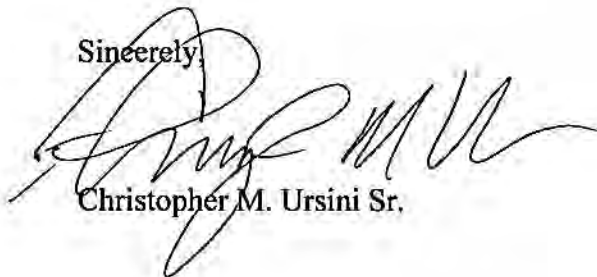
4.4.1 Recruitment Assumption: Young of year over the past 3 years has been well below average. I advise Option B which bases the rebuild of stock on a recruitment assumption that is more realistic with these poor year classes and will achieve a lower level of removals and appropriate restrictive management measures as opposed to the more suspect and highly risky options.

-Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

4.4.2 Rebuilding Plan Framework: The commission's legacy of inadequate and delayed action has contributed to the failed management of the striped bass stock. As such, avoiding delays and taking needed action as quickly as possible to rebuild is required to avoid a worsening situation. I advise:

- Option B: 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 recruitment assumption specified in Amendment 7) 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.

Sincerely,



Christopher M. Ursini Sr.

**SALT & TALE**  
LIGHT TACKLE & FLY FISHING  
CHESAPEAKE BAY  
**CHARTERS**

April 6, 2022

ASMFC

comments@asmfc.org

RE: Striped Bass Draft Amendment 7 Comments

Attn: ASMFC Striped Bass Management Board

I am a Light Tackle Charter Captain on the Chesapeake Bay and resident of Maryland. Striped Bass make up a significant portion of our fishery and smart, functional management practices are of the utmost importance to myself and many of my fellow Captains. For sake of keeping things short I will list the section and option I support but will not go into detailed explanation of each.

**4.1 Management Triggers**

Tier 1: Options A1, B1 & C1 (Status Quo)

Tier 2: Options A2, B1 & C1

Tier 3: Options A2 & B2

Tier 4: Option A

**4.2.2 Recreational Release Mortality**

Tier 1: Options C1, C2 & D2

I would like to air my concerns of Option B. While I support no-harvest closures, especially in the spawning areas I strongly disagree with no-target closures. No-target is an unenforceable cheat of the management system with no quantifiable science to support its function vs. no-target. The no-target closure here in Maryland, during the month of April specifically, has done nothing more than burden light tackle captains like myself from practicing safe, sustainable catch and release activities. While I am not promoting out of control harassment of prespawn Striped Bass I do believe that the practice is safe for the fish using proper gear and handling/release techniques.



**SALT & TALE**  
LIGHT TACKLE & FLY FISHING  
CHESAPEAKE BAY  
**CHARTERS**

Gear restrictions and education will provide a much stronger management solution than a simple no-target closure.

**4.4 Rebuilding Plan**

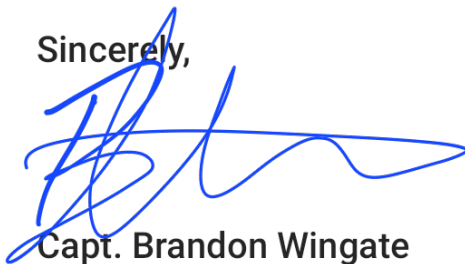
4.4.1: Option B

4.4.2: Option B

4.6.2: Options B1-a, C3, D2 & E2

Thank you for the opportunity to provide comment. At the end of the day we all have the same goal of rebuilding and sustaining the Striper stock so that we and our decedant's can enjoy these fish for years to come.

Sincerely,



Capt. Brandon Wingate  
Salt Tale Charters





March 2022

Captain W. Brice Contessa  
PO Box 3665  
Edgartown, MA 02539

ASMFC...

*I'm writing you today to offer my comments regarding Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass. I am a passionate advocate of striped bass conservation and have a vested personal and professional interest in a healthy stock that is managed for abundance throughout their range.*

*It is vital that the board no longer delays action on management triggers. The triggers are generally acceptable where they're currently positioned. Wherein the problem lies is the board's inaction when triggers are tripped. As it pertains specifically to fishing mortality, that factor should be reduced to target level or sub target level within one year. There is simply no evidence to support continuing to kick the can down the road. The same rationale applies to threshold and target triggers - the current parameters should be left in place. It is, however, time to update the recruitment trigger (sub-option A2). It seems as though this option is the path of least resistance for managers whilst still remaining cognizant of poor recruitment years/periods. The key is being responsive to the above mentioned periods of weak matriculation by reducing mortality when they do occur. The perennial trend of exploiting strong year classes and ignoring poor ones needs to end here and now.*

*As far as the implementation of a rebuilding plan is concerned the two year deadline is acceptable so long as it's adhered to. Note that striped bass were declared overfished and that overfishing was occurring in 2018 however we have yet to see the establishment of a plan to mitigate said infractions. We must avoid this inaction going forward. And furthermore, you mustn't defer management action. In the event a trigger is tripped the Board needs to respond regardless of when the last action was taken.*

*Needless to say recreational release mortality, much like striped bass management in general, is a dense, complex and multi-faceted issue. But one thing is very clear - the majority of anglers coast wide target striped bass do so on a catch and release basis. Targeting closures, although theoretically sound, are veritably impossible to regulate, difficult to enforce, essentially unquantifiable, and are simply not the answer so long as cohabitation with other species occurs. Likely the best way to address the release mortality issue is by adopting a game-plan that would prohibit recreational anglers from using lethal devices to remove or assist in the removal of striped bass (sub-option C1). The fact that we're even still discussing gaffing bass is frankly distressing and disheartening. Finally, closing the circle hook loop-hole and requiring striped bass that are caught as bycatch with non circle hooks by anglers "targeting" other species to be released (sub-option C2), although again hard to enforce and regulate, is a step in the right direction and should be adopted immediately.*

*Regarding outreach and education we must collectively strive to promote best handling practices (perhaps including those included in sub-option D1) via public education and outreach campaigns. Don't underestimate the importance of this; a little goes a long way with this kind of stuff! The return on what little investment it takes for states (and municipalities and private organizations) to make educational materials available through tackle shops, guides, fishing license packets and alike could have a significant impact. On my boat I've gotten in the habit of having clients who want to make a picture with a fish hold their breath while the fish is out of the water. A small step of course, but it minimizes the time the fish is out of the water and really puts the whole thing in perspective for the angler.*

*Although there's plenty to debate regarding strategy, efficacy and intention, mortality was addressed in the previous amendment. Sadly however, rebuilding was neglected. This is an area that requires immediate attention - the clock is ticking. Hindsight of course is 20/20, but this is a problem that has been on the proverbial radar for over a decade. The decision to go all in on the 2011 year class whilst subsequently allowing some states to run roughshod over harvest reductions has us where we are today; a nose-diving stock and no exceptionally strong year classes in the years since to buttress the plummet. Being that we are where we are the time is now to move toward rebuilding for a low recruitment regime. Recruitment is the worst it's been since the Carter administration for goodness sakes! The writing is on the wall and we need to read it. I'm honestly terrified of what we may learn when we get the update on the 2018 stock assessment in October. In that context, if the assessment shows what we all think it will (that the measures have a less than 50% likelihood of rebuilding the stock by 2029) then the Board must act quickly and decisively to stem the tide and aggressively begin the rebuilding process prior to the start of the 2023 season. Rebuilding is going to be painful for all interested parties but the longer we wait the worse it's going to be. It's unfortunate that such rapid action will limit the opportunity for public comment but I really see no other choice in the matter.*

*Conservation Equivalency is the single most important issue in Amendment 7; it has also likely been the biggest hurdle to striped bass abundance in the time period since the end of the moratorium. Conservation Equivalency frankly flies in the face of the spirit of interstate management for a migratory species in general as it allows individual states to essentially set their own regulations. Perhaps never in the history of fisheries management has a tool been so abused. There are several paths the board could take regarding Conservation Equivalency. Personally I would advocate its wholesale elimination but in the absence of total disbandment you must curtail its implementation when the stock is overfished. Lastly, as I'm sure you now realize, the state to state distribution of the reductions in Amendment 6 were hugely problematic. Going forward reductions must be tiered and distributed on a state by state basis predicated on removals.*

*Even those most critical and skeptical of the beliefs held true by the conservation community know the current situation is dire. We're running out of time, but it's not too late. Adopting the correct provisions to Amendment 7 have the potential to right the course of striped bass management for generations to come. I'm hopeful and confident that the Board will act in a manner mindful of posterity. Thank you for your time and consideration in this matter.*

*Respectfully yours...*

*Captain W. Brice Contessa*

To whom it may concern,

My name is Johan Frenje and I am born and raised in Sweden, and fishing has been a big part of my life since I was 4 years old. I came to the Boston area in the late 90's for work and a couple of years later I discovered the incredible striped-bass fishery in New England. I am a passionate fly-fisherman who cares deeply for our striped-bass fishery. Regarding the individual tiers/options related to Amendment 7, I've marked the options in bold that I fully support at the end of this letter. However, before I comment on the individual tiers/options of the proposed Amendment 7, I would like to make a few personal remarks.

I am beyond concerned about the striped-bass fishery. I don't have to look at advanced studies of the striped-bass population to realize it is in serious decline. My log book clearly shows that my banner years were in 2003-2005, when I was fairly novice striped-bass fisherman, and that I don't come close to those numbers these days. With a constant increasing fishing pressure, more detrimental environmental changes, and many despicable factors involving human beings, my recommendation is that the management board first and foremost prioritize the rebuild of the striped-bass population. I will support whatever measures are necessary to achieve that goal as quickly as possible.

I also want to comment on the despicable behavior of a large fraction of fishermen. I've seen enough over the years to realize that many folks abuse this resource by poaching and/or seriously mishandling the bass. They have no interest in preserving this fishery long term. This is especially evident at the Cape-Cod canal. Let me give you an example. Last year I ran into two big-fish blitzes at the canal during the fall run, and about 90% of the 100s of anglers mishandled the fish. They vertically lifted the fish by the gills, let the fish flop around on the rocks for minutes, and a few instances I saw pictures taken of several people holding the same fish. In addition, people carried over-slot-size fish in plastic bags up to their cars. Very alarmingly, this is not a unique event but rather happens on a routine basis at the canal. I am quite confident the 9% release-mortality rate doesn't apply to the Canal. That being said, I fully support the current regulation of no Commercial fishing in the Canal but this is insufficient. In addition, I recommend that only Catch and Release is applied to Recreational fishing at the Canal. The striped-bass population is just too vulnerable in that stretch of water. In addition, I strongly believe better education and outreach in this area would be beneficial.

Here are my comments on the individual tiers/options of the proposed Amendment 7. The options I support are marked bold.

#### *4.1 MANAGEMENT TRIGGERS*

##### *Tier 1: Fishing Mortality (F) Management Triggers*

Option A: Timeline to Reduce F to the Target

**Support sub-option A1 (status quo)**

Option B: F Threshold Triggers

**Support sub-option B1 (status quo)**

Option C: F Target Triggers

**Support sub-option C1 (status quo)**

##### *TIER 2: Female Spawning Stock Biomass (SSB) Management Triggers*

Option A: Deadline to Implement a Rebuilding Plan

**Support sub-option A2**



Option B: SSB Threshold Trigger  
**Support sub-option B1 (status quo)**

Option C: SSB Target Trigger  
**Support sub-option C1 (status quo)**

*TIER 3: Recruitment Triggers*

Option A: Recruitment Trigger Definition  
**Support sub-option A2**  
Option B: Management Response to Recruitment Trigger  
**Support sub-option B2**

*TIER 4: Deferred Management Action*

**Support option A (status quo)**

*4.2 RECREATIONAL FISHERY MANAGEMENT MEASURES*

Option B. Effort Controls (Seasonal Closures)  
**Support sub-option B2**

Option C. Additional Gear Restrictions  
**Support sub-option C1**

**Support sub-option C2**

Option D. Outreach and Education  
**Support sub-option D1**

*4.4 REBUILDING PLAN*

4.4.1 Recruitment Assumption for Rebuilding Calculation  
**Support option B**

4.4.2 Rebuilding Plan Framework  
**Support option B**

*4.6 ALTERNATIVE STATE MANAGEMENT REGIMES*

4.6.2 Management Program Equivalency

Option B. Restrict the Use of Conservation Equivalency Based on Stock Status  
**Support sub-option B1-a**

Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals  
**Support sub-option C3**

Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries  
**Support sub-option D3**

Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries  
**Support sub-option E2**

Thank you for the opportunity to comment. I hope that my voice will be heard.

Sincerely,



Johan Frenje  
Beverly, MA

To the Atlantic States Marines Fisheries Commission Atlantic Striped Bass Management Board,

As you continue with the Amendment 7 Draft and Public Comment process, I would urge you to consider the following input from a lifelong fisher and dedicated recreational angler who spends significant money in the New England states in the pursuit of this iconic fish.

Please note that this is NOT a form letter- it is written in my own words and should be considered a single, unique comment as part of the record.

First, I am a resident of Vermont and thus do not have representation on the Commission. However, I own a home in Maine, keep a boat in Maine, and spend the bulk of my summer there, fishing. I grew up in Rhode Island and travel there regularly to fish and to shop for fishing gear. I lived in New Hampshire, on the Seacoast, and travel there as well, regularly, to fish and buy equipment since the NH coast is the closest (and only day-trip) saltwater to my current home. Not including the \$50k wedding I am planning, in Maine, specifically located and timed to coincide with what little mid-coast Fall Run there is, I would estimate that I spend around \$10K a year on pursuit of Stripers.

So, while I may not be resident of any Atlantic State, I am a constituent of the Commission, a taxpayer, and spender, a contributor to local economies, and a stakeholder.

Let me say also that I am unequivocally in favor of conservation and abundance. Every economic and environmental analysis you all have access to shows that the value of a fish in the water is far higher than the value of a fish harvested. I support all measures that will increase the biomass, the SSB, the number of fish, the range of fish, and lower F and harvest numbers. The need for action is especially critical now given that spawning stock biomass is at a 25-year low and that the three most recent young-of-year indices in upper Chesapeake Bay are among the lowest on record.

I also support a Harvest Moratorium for all lengths of time. However, to be clear, I am adamantly opposed to a Targeting Moratorium. Stripers can and should be a catch and release fishery for all to enjoy and benefit from and I support its status as such for a brief period to rebuild the stock and achieve the rebuilding plan (and timeline) and long term as a management strategy and path to abundance. Target moratoriums are not enforceable, as your own law enforcement contacts have testified, and recreational release mortality is a tiny fraction of the total F- yet catch and release targeting contributes a huge percentage of the economic benefit and effort.

I can tell you from personal experience as an angler at the northern end of the migratory range, there just are not as many fish as there once was.

In more specific terms, I support the following options as proposed in the Draft of Amendment 7:

- 4.1 Management Triggers
  - TIER 1 OPTIONS: Fishing Mortality (F) Triggers
    - Option A: Timeline to Reduce F to the Target
      - I support **Sub-option A1 (status quo)**: *Reduce F to a level that is at or below the target within one year.* The Board needs to move quickly to reduce fishing mortality and overfishing. I support any management plan that shortens that timeframe.
    - Option B: F Threshold Triggers
      - I support **Sub-option B1 (status quo)**: *If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.* All other options put action on at least a 2-year timeframe, and two years becomes 3 with the way the data on F is collected and released through MRIP.
    - Option C: F Target Triggers
      - I support **Sub-option C1 (status quo)**: *If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the*

*target within the timeframe selected under sub-option A. This option creates the most conservative triggers and the shortest recovery timeframes of the options in the draft. It also creates alignment between Option A1 and B1 and formalizes the relationship between F and SSB.*

- TIER 2 OPTIONS: Female Spawning Stock Biomass (SSB) Management Triggers
  - Option A: Deadline to Implement a Rebuilding Plan
    - I support **Sub-option A2**: *Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment.* This option puts in place a two-year deadline to implement a rebuilding plan. A1 (status quo) does not put in place a deadline to implement a rebuilding plan. This is precisely the lack of trigger that got us here.
  - Option B: SSB Threshold Trigger
    - I support **Sub-option B1** (status quo): *If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].* B2 offers no trigger related to the female SSB threshold. While an F trigger would likely be in place it is also important to keep an eye on and take corrective measures if the female SSB is in trouble.
  - Option C: SSB Target Trigger
    - I support **Sub-option C1**: (status quo): *If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].* C1 offers the shortest time frame to rebuilding if the female SSB falls below the target. The rebuilding plan is already behind. This board should enact faster timeframes and triggers that actually trigger management action.
- TIER 3 OPTIONS: Recruitment Triggers
  - Option A: Recruitment Trigger Definition
    - I support **Sub-option A3**: *The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model (NY, NJ, MD, VA) shows an index value that is below the median of all values in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years. The high recruitment reference period used for this trigger may be adjusted as recommended by the TC during benchmark stock assessments.* The status quo (current trigger) has only been tripped once in the period between 2003-2020. It is not sensitive enough based on where the stock is currently at. I understand that oversensitivity may ultimately be a poor management strategy. However, given that the status quo trigger has not been effective, I support the most sensitive of triggers until the stock is rebuilt to abundance.
  - Option B: Management Response to Recruitment Trigger
    - I support **Sub-option B2**: *If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.* In the past, the board has failed to adjust F to account for both good and bad year classes (recruitment). With several recent years of poor year classes, we the board needs to be more responsive to these shifts. B2 puts an interim F target adjustment in place if the recruitment trigger is tripped.

- TIER 4 OPTIONS: Deferred Management Action
  - I support **Option A (status quo)**: *No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.* I cannot support any options which allow the board to defer action if a management trigger is tripped. Options B-F all allow for deferred action by the board in the event of a management trigger. Given where the stock is currently at, overfished with overfishing occurring, the “Board’s concern about the frequent need for management action due to triggers tripping with each stock assessment update or benchmark” is quite frankly, an abdication of its own responsibility and the public trust.. Stock assessments are typically conducted every 2 years (COVID delayed the last one) and benchmark assessments every 5 years. If the board needs to convene and act more frequently to maintain a healthy stock then so be it.
- 4.2 Recreational Fishery Management Measures
  - Option B. Effort Controls (Seasonal Closures)
    - I do not support the inclusion of seasonal closures in Amendment 7. I fully support the need and effort to limit recreational release mortality. However, the options being put forth do not meet that goal or the criteria discussed above.
    - I oppose the concept of state specific closures (Sub-option B-1) because the disproportionate share of the burden- of both fishing opportunity and economic benefit, it would put on the more northern state. I literally live and fish at the northern end of the range. Some would argue I live one drainage too far north. Northern states have shorter seasons and water conditions much more conducive to post-release survival.
    - I am opposed to the implementation of no-targeting closures at the time—either at the two-week state-specific level (Sub-option B1) or for spawning areas (B2-b). The conservation impact of such closures cannot be quantified and as mentioned earlier, there are extraordinary enforceability concerns. As the draft amendment states, estimating the benefit of no-targeting closures depends on assumptions about how angler behavior might change, which is highly uncertain, and the striped bass Technical Committee has yet to establish a method for estimating the reduction in mortality resulting from no targeting closures. Until such a methodology is implemented, no-targeting closures would largely be punitive to the catch-and-release striped bass angling community, of which I am a member, with no tangible benefit for the resource. Furthermore, no-targeting closures present an intractable enforcement challenge<sup>4</sup> given that the burden is on the law enforcement officer to prove intent of target species (e.g., similar methods used to target striped bass are also used for bluefish in marine environments and catfish in estuarine environments). I literally use the exact same gear and flies to target both species and could easily and justifiably claim I am targeting and open species while targeting a closed species. Lastly, several producer areas have robust commercial seasons (gillnet and haul seine fisheries) during the early part of the spawning run. If the intent of these proposed measures is to ensure a safe passage during the spawn, it is counterintuitive that these would be recreational-only measures. For the record, I am opposed to ongoing commercial harvest of Atlantic Striped Bass, but I know that option is not currently a possibility, though it should be.
    - I would also encourage the Board to identify opportunities for increased research on post-release mortality of /sublethal impacts on large pre-spawning and spawning striped bass. Understanding even the biological impacts of catch-and-release fishing on these fish is critical for informing management and creating empirically-based decisions.
  - Option C. Additional Gear Restrictions



by states to reach the overall reductions necessary. Option B, sub-option B1 provides the most limitations to the use of CE by states, some of whom have taken advantage of it. The stock needs to be managed for abundance. CE has no place in a stock that is overfished with overfishing occurring.

- 4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals
  - I support **Sub-option C3**: *CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30.* I taught statistics for social sciences in graduate school. Any student who claimed scientific rigor with PSE in the 50% and 60% range, as do some states using MRIP to justify CE, would have failed my class. That is not science. That is data manipulation in the pursuit of meat on decks. End this practice, now.
- 4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries
  - I support **Sub-option D3**: *Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 50%.* I understand that option D2 is probably a more reasonable and scientifically justifiable end. However, I do not trust that the states currently taking advantage of CE will not find some way around it or any other compromise measure. Thus, I speak for the most conservative alternatives until the biomass is rebuilt and the fishery is restored to abundance. I actively hope that this will discourage states from using CE in the first place.
- 4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries
  - I support **Sub-option E2**: *Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state-specific level.* Fair and equal are not the same thing. It is fair and equitable that states bear proportionate burden when a reduction is needed. Requiring states to achieve their respective change in fishing increases the likelihood of the achieving the coastwise target and removes the burden on northern and conservation minded states who get less fish when states don't share in the reduction, and then have to reduce on top of that to stay in compliance.

Striped Bass are at the core of the East Coast's recreational fishing community and economy. They are at the core of my lifestyle and recreation choices and a big part of the traditions that my family participates in and that I care to pass on to future generations. It is literally the flagship species of the ASFMC, and it is in true danger, not of some decline, but of decimation. I encourage you, as the voice of the people in this matter, not just of commercial interests and organized lobbies, to do everything in your power to conserve this species, put it on the path to recovery, and create a fair and diverse and equitable access to an abundant fishery for generations to come.

Thank you for your time.

Sincerely,



Norm Staunton

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## ASMFC Amendment 7 Statement

The Maryland Charter Boat Association is the largest group of professional Captains on the Chesapeake Bay who promote sustainable sport fishing and local tourism. We are small business owners and family businesses that operate in your community.

Over the past two seasons we have continued to build our relationship with the State of Maryland and have participated in the FACTS reporting system as professional fishermen. The hope of our reporting is to assure fishery managers the accuracy of our data and that its punctuality occurs in real time.

In an act of preservation, in 2020 the State of Maryland acted to reduce harvest of Striped Bass by 18% and a total of 28% including Commercial harvest. Consequently, our industries season was shortened in a three phase effort help rejuvenate the Striped Bass population. In summary: 13 days of our Spring Fishery was eliminated, 16 days of our Summer Fishery was canceled, and the last 5 days of our Winter Fishery was closed. This effort that was once available to us as anglers can also be seen in Amendment 7's public comment on page 61 based on the 2019 data set. The alterations to the season will continue into 2022.

We are thankful for our partnership with fishery management staff within the Maryland Department of Natural Resources. This partnership has afforded us the opportunity to continue to fish within our current 6 month, 3 week Striped Bass Season.

Our concern, year in and year out is what is next? What will impact our businesses? Will we be able to operate in Maryland as an industry if proposed regulations continue to shorten our seasons and daily harvest limits?

We know as an industry that we have met the proposed Option B1-A effort controls proposed by ASMFC in Amendment 7. We feel that any other additional closure in the Chesapeake Bay for the For-Hire fleet is unnecessary due to our already abbreviated season. Our industries business model is reliant on a fishery that attempts to avoid unnecessary catch and release, or handling of Striped Bass. We are professional fisherman and utilize the best fishing practices and gear to avoid additional unnecessary discards during our trips. We feel that shifting to a one fish per angler limit for the for-hire fishery will not only result in unnecessary catch and release but will deter future customers from wanting to participate as anglers on our vessels.

Though our portion of the total Striped Bass harvest is minimal in comparison to the total data set, it should be the most accurate based on its parameters. To elaborate, as professional fishermen we have been asked over a two year period to log not only harvest data of all species through the FACTS Reporting System, but all releases, methods, and even bait caught. This comprehensive data set was recorded per trip and verified by random surveys by Maryland Department of Natural Resources employees. These employees were given our estimated check in time back at the dock with advanced notice during each trip. Our customers also took surveys after each trip when requested by state employees to verify our harvest data accuracy and their personal fishing history within the past season.

Not only have our Captains and Crew have been willing to better this fishery, our customers have devoted their time to it as well.

As Maryland Captains on the Chesapeake Bay we are the most concerned fisherman about the health of our fishery and the volatility of potential management decisions year after year. We feel that we have continued to sacrifice a large portion of our once open season, to accomplish fishery managers' goals. We feel that our For-Hire harvest data is as accurate and predictable as the commercial fishery. In comparison, we harvest roughly an estimated third of what the total commercial sector harvests annually (Number of fish Harvest by For Hire Charter Boats - Year 2018: 174,737, 2019: 167,203; 2020: 146,290, 2021: \*139,460 (\*as of end of November 2021) reports received April 6, 2021 & December 2021 from Public Information request). When comparing harvest records as an industry from 2018 vs 2021 's supplied data we have reduced our harvest by 25.3%.

As professional fishermen we strongly believe our release mortality rate is equivalent to or lower than the commercial fishery in Maryland. As professional fisherman we understand the correct way to handle and release fish. We are professional fisherman that hold the same credentials as all commercial fisherman, we all

are required to own a Tidal Fish License or a Guide's License to participate in our fishery. There is absolutely no logical reason why we as professional fisherman, are considered to have a higher release mortality than our colleagues in the commercial fishery. The unique ability to manage of our fishery and understanding the differences between the mortality of professional fishermen and recreational fishermen is a key principle that is only defined through Conservation Equivalency. The rationale that we are reliant on MRIP data estimates and not our own reporting harvest system creates even more division and opportunity for error in the Chesapeake Bay.

As professional fishermen we are well aware of the ever-changing dynamics of the Striped Bass Fishery on the Chesapeake Bay. We understand the regional differences and opinions that are proposed year after year. We understand the opinions of the recreational fishermen and commercial alike. We understand Maryland's uniqueness in the entirety of the Striped Bass fishery on the East Coast of the United States and support its opportunity to use conservation equivalency to manage its fishery.

We understand that personal observation of migration patterns through harvest data has changed, fishery biomass during seasons have changed with Chesapeake Bay health (as a result of depleted oxygen levels from algae blooms and pollution from multiple states), additionally predators have affected the fishery (including invasive species such as Blue Cat Fish & Snake Head, increasing observations of schools of Porpoise are natural predators and effect the location of the Striped Bass biomass in the Mid-Upper Chesapeake Bay during the Summer months, etc.), and climate change has affected the timing of the Spawning Stock Biomass, etc.

We also understand that with continued proposal of aggressive regulation it demands sacrifice as business owners. We have made the sacrifice already and continue to do so. We feel that our harvest data can be utilized to better the health of the bay and that our industry has been willing to make our best efforts to do so within reason. We feel that we are already operating within the required reduction of 15% directed trips that is proposed in Amendment 7 and the harvest data to be released in October will only support this effort made by our Captains.

We also know that the urgency and option to quickly push an objective through without public comment after October of this year is not in the interest of recreational, For-Hire, or Commercial fishermen. This should be a developed process that is given enough time to mature and allow for the participation of all parties of interest with the new data set in hand. The proposal to do so is unwise and a radical conclusion.

We support regional conservation efforts; we are stewards of Maryland's State Fish and sportsman alike. We support the betterment of the Chesapeake Bay's fishery and have done so historically through action and our recorded efforts. We understand the uniqueness of Maryland's fishery in comparison to the related Atlantic States and understand the importance of honoring conservation equivalency. We are fully vested business owners that are reliant on Maryland's State Fish in order to operate and are hopeful that our season will be restored through the principles of its current management strategy.

CONSERVATION Equivalency is needed IN  
THE CHESAPEAKE FISHERY AS WE FISH ON  
A SMALLER CLASS OF FISH ALL YEAR AS  
COMPARED TO THE OCEAN FISHERY.

Roddy

ROBERT D. FLYNN - CAPTAIN/OPERATOR/OWNER  
U.S. BLUES CHESAPEAKE CHARTERS LLC

April 7, 2022



ASMFC Commission Attn: Emilie Franke,

My name is Evan Keller. I am an avid surfcaster and part of the plug building and conservation minded community that grows larger every year. I entered this diverse community on the tail end of what seemed to be a great recovery in the 2011/2012 timeframe. I have a strong science background and a good understanding of data. While data drives decisions, or at least should; there is strong correlation to a “fisherman’s story” and how the biomass is suffering.

I cannot tell you how many times I have heard from a long-time surfcaster, or sharpie, how good it used to be.... This is almost the siren song of the Striped Bass fishermen. How good it used to be.... I love the sport and the friends I’ve made, and I truly feel a sense of responsibility to help the population in any way I can. This same sentiment I feel is not held to a high regard by anyone in the regulatory body that makes up the ASMFC board. How many years does the SSB have to fall short of the target for changes to take place? If we all are only looking out for ourselves, we’ve lost sight of the big picture.

I have summarized my public comment, in support of each Option stated in the draft Amendment. I am concerned that somehow the commercial sector has not been considered at all in this document. There is heavy pressure on changing the regulations on the recreational sector, however it is negligent to assume the pressure put on Striped Bass by the commercial sector is any less detrimental. Numbers indicate rec people make up over double the harvest rate, but how is it possible to monitor and evaluate things like bycatch, bycatch release mortality, undersize release mortality, fishing method of take negligence (i.e. not checking nets, leaving nets in too long, gaffing, etc...)? This seems like a big oversight.

We have reached a point where mismanagement and greed have taken over sound science and understanding. Everyone will need to suffer in the short term in order to see a positive change. This is not lost on me, and I am in favor of it. Remember, IF THERE IS NO MORE STRIPED BASS COMMERCIAL FISHERMAN WON’T HAVE A JOB TO GO BACK TO. That goes for anyone that benefits in some small way from the sport or harvest of Striped Bass.

-Evan Keller

Public comment on the Tier options for Amendment 7:

**Tier 1 Option A** – Support Sub-Option 1 (status quo). The effort should not be delayed any more than 1 year.

**Tier 1 Option B** – Support Sub-Option B1 (status quo). Again, let’s make the adjustment time period as short as possible.

**Tier 1 Option C** – Support Sub-Option C1 (Status quo) – mortality should be assessed effectively, and a determination made in a shorter timeframe. Waiting for 3 years could effectively lead to collapse as data is collected.

**Tier 2 Option A** – Support Sub-Option A2 – A 2-year deadline will help to hold ASMFC parties, recreational anglers, and commercial fisheries accountable.

**Tier 2 Option B** – Support Sub-option B1 – obviously cannot support a no management trigger sub option.

**Tier 2 Option C** – Support Sub-Option C1 (status quo) – tighter timelines are more favorable. The population is obviously suffering already, why delay.

**Tier 3 Option A** – Support Sub-Option A3 – High sensitivity is needed to cause more frequent management of a suffering biomass.

**Tier 3 Option B** – Support Sub Option B2 – This seems to assume mortality based on an already low recruitment which would be conservative and triggers a tighter timeline for management programs.

**Tier 4** – Support Option A (status quo) – There should be no deferment, especially when the population is suffering and there is a data lag. This needs to hold responsible parties accountable.

## 4.2 Rec Management Measures and Options:

**Support Option B specifically Option B2-b** No Target Spawning closure required – the spawning fish need to be protected. How can you have a management trigger (SSB) if you don't protect them in the first place.

## 4.3 Commercial Fishery measures

While the recreational group represents the supposed high allotment of release mortality, it is ridiculous to not even reconsider the effect of mortality due to removal and bycatch of Striped Bass by the commercial sector. I support stringent recreational measure even to the point of a non-target or restriction of targeting Striped Bass. But to close down on the recreational angler and still allow commercial rigs to absolutely take advantage of a suffering population is ridiculous and shameful.

The management and enforcement bodies need to turn a fine focus on every party which utilizes our SHARED resource. How they are not considered only seems to support the assumption by many that the commercial fisheries remain a political card to be held by states, and to fund corrupt individuals in state government. Shameful.

### 4.4.1 Recruitment Assumption

**Option B support** – more conservative and will contribute to stricter management measures

### 4.4.2 Rebuilding Plan

Support Option B – rejecting the status quo will allow for voting and a reassessment of both commercial and recreational impact. This is a way to get the Commercial quotas evaluated and the bag limits, size/slots, among other things that somehow the Commercial sector was able to avoid in the general language of Amendment 7

### 4.6.2 Management Program Equivalency (CE)

**Support Option B** to restrict CE but encourage the removal of present CE programs sooner. States should not operate independently which encourages judgement outside of a likely biological and habitat based science and is heavily influenced by money and politics.

Albert C. Perrino, Jr  
5051 Ridge Rd  
North Haven, CT 06473

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

Date: April 4, 2022

Subject: Draft Amendment 7 of the Atlantic Striped Bass Fishery Management Plan

Dear ASMFC Commissioners,

Under this commission's often imprudent oversight, we find the striped bass stock overfished, depleted, and with low recruitment. The ASMFC has achieved the trifecta of resource mismanagement. The impact on the recreational angler and the economies and communities that rely on them has been severe. The undisputed and now very public failure of the ASMFC to meet striped bass stock biomass and fishing mortality rate targets has led to widespread criticism of this commission which was entrusted by the public to manage this uniquely valuable resource. ***At this juncture, the harm done to the striped bass fishery under your watch has damaged the credibility of the ASMFC and brought the integrity of the process under question.*** In this letter, I provide my advisement to the commission on Draft Amendment 7 of the Atlantic Striped Bass Fishery Management Plan with the goals of not only rebuilding this once prized fishery but rebuilding the integrity of the ASMFC as well.

4.6.2 Conservation Equivalency (CE): Let me begin by addressing CE, one of the key tools that has been weaponized by some member states to subvert ASMFC's fisheries management. Specifically, CE has been used as a conservation loophole by individual states with the result being failure to meet even the inadequate reductions in fishing mortality rate targets set by ASMFC and further depletion of the stock. New Jersey's CE in Amendment 6 is just the latest example of harmful use of CE and illustrates both the hazards (i.e. increased risk) and low predictability (i.e. high uncertainty) inherent with the use of state specific CE formulas. As such, the following options are amongst the most important for the commission to address excessive fishing mortality in Draft Amendment 7. I strongly advise the commissioners to adopt:

-Sub-option B1. Restrictions: CE programs would not be approved when Sub-option B1-a: the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

-Sub-option C3: CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30.

-Sub-option D3: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 50%.

- Sub-option E2: Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state-specific level.

4.1 Management Triggers: The years of failure of the ASMFC to meet needed mortality reductions and the resulting low biomass of fish and spawning stock requires aggressive management triggers to avoid catastrophe and assure 'in time' reductions in excessive fishing mortality. Without these measures the approaching collapse of the fishery is clearly in view. I strongly advise the commission adopt the following sub-options under Option A:

-Sub-option A1 (status quo): Reduce F to a level that is at or below the target within one year.

-Sub-option B1 (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

-Sub-option C1 (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

-Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment.

Option B: SSB Threshold Triggers: Without a strong SSB there can be no consistent reproduction to rebuild and sustain this prized fishery. Yet, the ASFMC has been unable to achieve even this most fundamental objective, in part, due to its repeated poor management practices. Adoption of the following options best address a foundational element of prudent stock management, that being the safeguarding of a strong SSB.

-Sub-option B1 (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

-Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

Tier 3 Options: Recruitment is an essential element of rebuilding and maintaining the stock. The JAI provides a valuable tool for managing striped bass that is independent of overall stock biomass assessments. Let me provide an example. Some fishers have claimed the striped bass stock has moved “off shore” and we are underestimating the stock biomass and should let the killing continue. However, all spawning fish must return to very limited breeding areas, primarily the Chesapeake Bay and Hudson River, to reproduce. The low JAI and young of the year indices of recent years provides additional strong evidence that the SSB is not sufficient for a healthy stock and that claims of “redistributed” biomass are either fanciful, anecdotal, or irrelevant. We must include strong reproduction, *per se*, as a key, independent, metric of the management plan. As such, the commission is required to adopt the following more sensitive triggers regarding low recruitment and preclude the excessively risky models which have led to the tragic management results we are currently facing:

-Option A -Sub-option A3: The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model (NY, NJ, MD, VA) shows an index value that is below the median of all values in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years. The high recruitment reference period used for this trigger may be adjusted as recommended by the TC during benchmark stock assessments. This trigger alternative has a higher sensitivity than both the status quo trigger and sub-option A2.

-Option B- Sub-option B2. If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

Tier 4 Options: Inaction or deferring action when a management trigger is tripped is the hallmark of ineffective management and an example of another management failing that has plagued this commission. Accordingly, I advise:

-Option A (status quo): No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

#### 4.2 Recreational Fishery Management Measures

Option B Seasonal Closures: Allowing anglers to target fish, both commercial or catch and release, on their spawning grounds or areas where they congregate prior to spawning is both unsporting and unhelpful to the reproduction critical to rebuilding and maintaining stock biomass. Given the low recruitment we face, this practice cannot be supported. I advise:

-Sub-option B2-b. No-Targeting Spawning Closure Required: All recreational targeting of striped bass would be prohibited for a minimum two-week period on all spawning grounds (not necessarily the entire spawning area) during Wave 2 (March-April) or Wave 3 (May-June), as determined by states to align with peak spawning. States will determine the boundaries of spawning ground closures. Closures prohibiting recreational targeting on spawning grounds have already been implemented in Maine (Kennebec River), New Jersey (Delaware River), and Maryland (Chesapeake Bay) during part of Wave 2 and/or Wave 3.

Option C: Gear Restrictions: I fully support the following measures which limit unnecessary catch and release mortality as listed below:

-Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

-Sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

Option D: Education: I support state supported angler education to reduce unnecessary catch and release mortality as below:

-Sub-option D1: States would be required to promote best striped bass handling and release practices by developing public education and outreach campaigns. States must provide updates on public education and outreach efforts in annual state compliance reports.

#### 4.4 Rebuilding Plan

4.4.1 Recruitment Assumption: Young of year over the past 3 years has been well below average. I advise Option B which bases the rebuild of stock on a recruitment assumption that is more realistic with these poor year classes and will achieve a lower level of removals and appropriate restrictive management measures as opposed to the more suspect and highly risky options.

-Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

4.4.2 Rebuilding Plan Framework: The commission's legacy of inadequate and delayed action has contributed to the failed management of the striped bass stock. As such, avoiding delays and taking needed action as quickly as possible to rebuild is required to avoid a worsening situation. I advise:

- Option B: 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 recruitment assumption specified in Amendment 7) 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.

Sincerely,



Albert C. Perrino, Jr.

April 07, 2022

Emilie Franke  
Fishery Management Plan Coordinator  
Atlantic States Marine Fisheries Commission  
1050 North Highland Street  
Suite 200A-N Arlington, Virginia 22201  
comments@asmfc.org (subject line: Striped Bass PID)

**Subject: Striped Bass PID/ Amendment 7**

Dear Ms. Franke,

I hope this letter finds you well. I'm going to start off by saying I'm going to be straight forward and try to make some points and give you a background of where I am coming from and what I have seen personally. My name is Mike Milillo; I am currently 30 years old. I was born and raised on long island and currently live on long island. I have been surf fishing for bass since I was about 8 years old, my father got me into the sport.

Now in these past 22 years I have seen the population of bass dramatically change before my eyes, and not for the good. When I was a kid to a young teen all I could think about is how I can't wait to have similar memories with future kids of mine like my father and myself have. Unfortunaley in my later teens and early twenties to now I have come the bleak realization that hopefully I'm going to be lucky enough to still be able to fish for bass when I'm in my 60's.

It has gotten to the point for me that my flame of love for the sport is smoldering. My passion is no longer there given the current state of the bass population. Day after day I go out fishing hoping to get even a bump on my line and nothing. With each passing adventure of getting skunked this flame gets smaller and smaller still.

There is something that I can't understand with the regulation of stripe bass and maybe this can be addressed. Ive also fished for fluke just as long when I was a kid I remember the fluke size limit be 13" I also remember the fluke size limit being at 21.5". Now ever year the size limit is revised and assessed on the stock of the fluke, why can't something like this be done for the stipe bass. A yearly review of the population and revise the limits accordingly. Fluke and stripe bass are targeted the same by commercial and recreation fisherman alike.

A look back in history will tell us what to do and when to do it. It must be done before it's too late. The stripe bass have seen this before and the stock was rebuilt. Florida has rebuilt and is still managing the red snapper population. We should be proactive instead of reactive and make sure stripe bass are here to stake from recreation and commercial fisherman alike.



Hopefully this sheds some light in a different perspective, I'm just one guy behind a computer hoping to get some personal insight across, no politics, no money, no bullshit, just the first hand unfiltered information we have in front of us, that I've witness with my own eyes. In any event, the following are my selected options from the Public Information Document:

### **Tier 1 – Timeline to Reduce F to Target**

I select **Sub Option A1**, which is status quo from Amendment 6, and requires a reduction of F to target level or below within one year. It would seem backwards, given the declining state of the fishery to create a rule that could delay action.

I select **Sub Option B1**, which is status quo from Amendment 6, and keeps the Threshold Trigger at 1-year for F exceedance for management actions to be considered. Other options would allow for delayed management actions. And again, given the declining state of the fishery to create a rule that could delay action.

I select **Sub Option C1**, which allows for quicker management actions to be taken when faced with F exceedance. By choosing any of the other options, we could be faced with a situation where the fishery continues to get abused for multiple years before action is taken. This would require future actions to be more painful to user groups than they need to be.

### **Tier 2 – SSB Triggers**

I select **Sub Option A2**, which requires the Commission to issue a rebuilding plan within two years if a SSB trigger is tripped. Other options would potentially delay recovery actions. Sadly, this is the hole that the Commission dug for itself in allowing the abundance of striped bass to the point it has, over the past decade and a half.

I select **Sub Option B1**, which is a status quo option that keeps the SSB Trigger set at "if the SSB drops below the threshold, the management plan must be adjusted within an established time-frame". Delaying action has proven to be a problem with management of Striped Bass, particularly given political involvement in the process.

I select **Sub Option C1**, which states that trigger for SSB Target would be 2 years of falling below the target to require management action. Once again, the other sub options seek to allow more time to pass for the managers to take action, which is counterintuitive to me.

### **Tier 3 – Recruitment Triggers**

I select **Sub Option A2**, as it seems to be the most reasonable option. This allows for the trigger to be place at a meaningful level, so as to enable the managers to take corrective actions, in the event that the fishery suffers poor recruitment, while the fishery is in an overfished state.

I select **Sub Option B2**, as I believe that it allows for a properly conservative response to low-recruitment data. In the event that the fishery shows sufficient improvement, over time, I could support an addendum that would relaxed a bit (such as described in the other Sub Options).

### **Tier 4 – Deferred Management Action**

I select **Option A**. With declining striped bass abundance over the past 15 years, we can't be allowing for options that would defer action. The time for that has passed. The need for Amendment 7 should be proof of it.

### **Recreational Management Measures**

I select **Option B2-a**, which would mean no harvest of bass in spawning areas from January through April. This would have a great effect on the fishery, while not a burden to fishermen, who, in my experience, get more enjoyment from catching the fish than eating them.

I select **Sub Option C-1**, which would outlaw the use of gaffs on Striped Bass.

*I have no comment on Option C-2, as I feel the use of circle hooks is difficult to enforce, and that, in some sense, the ASMFC has to manage the striped bass to account for and accept a certain degree of recreational mortality. As a responsible fisherman who almost never gut hooks fish, I want the freedom to fish with the hooks that I want to use.*

I select **Option D2**, which recommends to states to do outreach and education on proper fishing and handling of fish practices. I think it too burdensome to "require" states to do such programs and also will cost them financially.

### **Rebuilding Plan**

I select **Option B** because by using an assumed low recruitment regime, we can offset issues where F is not accurately being identified.

### **Rebuilding Plan Framework**

I select **Option B** because it allows for quicker action by the commission in the event that the 2022 stock assessment results show that this is needed.

### **Management Program Equivalency**

I select **Option B1-a**, as I believe this makes the most sense. When the fishery is at or below the biomass threshold, states should not be allowed to toy around with their regulations. As history has proven, this is risky business.

I select **Option C**. MRIP data should not be usable in coming up with Conservation Equivalencies, in cases where the Standard Error is above 30%.

I select **Option D2**. It is practical and "careful" to require a 25% uncertainty buffer in proposals for CE.

Sincerely,

Mike Milillo  
36 Vassar Street  
Garden City, NY 11530

ASMFC,

I'm 67 years old and have been a hardcore striper fisherman from my late teens until the regulations prohibited us from being able to harvest a large fish. In my prime, I used to fish the jetties in New Jersey 75 nights a year or more. I am a trophy fisherman but don't take that the wrong way. I always practiced conservation and would only keep a couple fish each year. I've released bass over 40 pounds and I'm one of the few fishermen in New Jersey who has caught documented 50 pound bass from both the shore and my boat. That is what drives me, these fish were not Facebook fifties, they were documented. I want to be able to keep a personal best, a trophy or record or some sort. I am not interested in length or in keeping slot fish in the 10 to 25 pound range as these are the real prime breeders that would remain in the system for many years if they were not allowed to be harvested. It's a shame that you did not take action to protect them, particularly the 2015 year class.

That having been said, I urge you to adopt the most restrictive measures and restore the stocks to abundance as quickly as possible. It seems that this is my only hope of some day being able to return to the sport I love and once again be able to keep a trophy fish, even if restricted to just 1 or 2 a year. One exception though is that I do not support the prohibition of using a lethal device, specifically a gaff for landing stripers from our jetties. To try to land them any other way from a high jetty in a rough ocean at night particularly while alone is extremely dangerous and nearly impossible. For those I release, I can usually manage to gaff them in the mouth. However, I don't have a problem prohibiting the use of gaffs while fishing on a boat.

The most important thing for you to do though to quickly restore the stocks is to prohibit the targeting of stripers during the spawning season. For instance, the Hudson River stock is becoming increasingly important to our fishery as the Chesapeake and other stocks diminish. What goes on in the Raritan Bay area from late March to early May is an absolute disgrace! The fish are congregated there and on any given day there are hundreds of boats fishing there. Any idiot can catch them and many people are catching 20, 30 or 40 fish each. Shore fishermen are also numerous and putting a real hurting on these fish. In addition to many of these prime breeders be harvested, the 9% mortality rate of released fish is going to destroy this fishery if you do not put a stop to it. This situation is further exacerbated by the amount of poaching that is going on there. Recently, Dep. Chief Jason Snelbacker of the NJ Bureau of Marine Law Enforcement stated that this is the most widespread amount of poaching that has occurred during his entire career. I urge you to stop all targeting of stripers for at least two weeks during the pre-spawn and spawning periods. That will make it much easier to enforce. With more fish being removed from the biomass due to release mortality than those that are being harvested, it's time for the c&r crowd to accept some responsibility to help restore our stocks by not targeting them at all during the spawning season.

Respectfully submitted,

Paul Haeertel

April 10, 2022

James M Patrick  
2 Pleasant Court  
Marblehead, MA 01945  
[patpatrick@comcast.net](mailto:patpatrick@comcast.net)

To whom it may concern:

My name is James M Patrick. I am seventy-five years old. I live in Marblehead, MA. I was born and raised in Florida and after having lived in North Carolina, Indiana, and now Massachusetts since 1988, fishing up and down the Atlantic Coast has been central to my life since I was five years old. Soon after coming to New England, I engaged striped-bass surf casting. Regardless of region or location, I have both recognized and took part in the sport's enjoyment and its role and impact upon proper environmental and species-specific management.

Regarding the individual tiers/options related to Amendment 7, I believe other anglers from the Plum Island Surfcaster have sent better comments than me. I agree with those sent comments.

Following I make what I believe pertinent and proper remarks about how best to address the declining striped bass fishery, public education and legal enforcement.

I am seriously concerned about the east coast striped-bass fishery population both currently and looking forward as well described in the scientifically derived data of note. I don't necessarily have to look at advanced studies of the striped-bass population to realize it is in serious decline as I clearly recall my catch histories from 1989 to present. I recall my best catches in 2003-2009. My catch totals today do not come close to those earlier numbers regardless of better fish monitoring, information, materials and methods.

It is the inarguable diminishment of catch over time which clearly defines the need for immediate reasonable, rational and scientifically based interventions including enforcement both surf and commercial. I am not addressing the commercial issues here as I want to focus on the surf caster. However, that said, the commercial impact clearly shows inconsistency as regards scientific evidence and demands proportionate and urgent attention as such commercial harvests cannot be sustained. Clearly further regulation and enforcement is needed.

My principal recommendation is that the Management Board first prioritize the stabilization and consequent rebuild of the striped-bass population. If I read the well-done scientific studies correctly, it appears that improper and illegal surf casting behaviors is of significant proportion and negative impact on the survivability of the striped bass fishery. That said, and in my opinion, enforcement at the surf casting level may well be of proportionate impact and lasting value. That is to say, and I strongly recommend, enhanced and proportionate enforcement be considered a first practical step. We need enforcement of applicable regulations now as a first step rather than mulling “what is to be done” The immediate solution is clear and easily attainable. Simply said, “more boots on the ground”. And specifically, as an example, at the Cape Cod Canal (but again not exclusively).

I and my immediate coterie of surf casters support most proposed measures we see as necessary and proper to achieve the goal of stabilizing and preserving the striped bass fishery as quickly as possible. Those of us who comply to current regulations and laws want the benefit and rewards of doing so. We have nothing to lose by compliance.

But I also want to comment on the behavior of a clear and large fraction of surfcasting fishers I see firsthand. I’ve seen enough over the

years to realize that many people abuse the striped bass natural resource through poaching (i.e., keeping fish outside of set requirements) and mishandling landed striped bass. They, speaking in the generality, appear to have no interest in preserving this fishery in the short or long term. This is especially clear at the Cape Cod canal. Last year I experienced big-fish blitzes at the canal during the fall run, and about 90% of the multitude of present anglers mishandled the fish and kept fish outside of set requirements. Such cannot be tolerated going forward.

Such mishandling included vertically lifting the fish by the gills, letting the fish flop around on the rocks for minutes, and in certain instances, I saw pictures taken of people holding the same fish as trophy. In addition, people carried over-slot-size fish in plastic bags up to their cars. Very alarmingly, this is not a unique event but rather happens on a routine basis at the canal. I believe the 9% release-mortality rate reported in no magnitude approaches my observations of abuse at the Cape Cod Canal. The abuse at that site approximates well over fifty percent. I also fully support the current regulation of no commercial fishing in the Canal; but again, such is not the thrust of my comments.

I further recommend that catch and release is unconditionally applied to recreational fishing at the Massachusetts Cape Cod Canal; no keep is a reasonable consideration to require for the near future. The striped-bass population is, currently, too vulnerable in that stretch of migratory water. In addition, I strongly believe better education and outreach in this area would be beneficial especially among the casual fishers. Perhaps a short video on the necessity and execution of proper striped bass handling upon landing and release as a requirement for licensure.

But, and again in my opinion, the only practical solution to shore/surf casting practices and results by both the willing and the offending is enforcement, enforcement, and enforcement of current requirements. And again, instead of mulling novel approaches however attractive the obvious solution is the practical best solution. And as you know that simple solution requires budgetary, recruitment, training, deployment, and \$\$\$\$\$, all dependent on political will and action. But it stays inarguable that enforcement of current regulations and aggressive public education is first and practical, easily reachable goal.

At my age, few such near-term changes will affect my immediate experiences. My commentary, and my community, is intended to preserve as may be contemporarily possible, and, going forward, to enhance the surf casting experience and enjoyment for future generations, its economic impact, and the recruitment of environmentally sensitive initiatives. Only reasonable and rational scientific approaches, public education, and stringent enforcement will assure these goals. I urge you to take the obvious actions now.

Thank you for the opportunity to comment.

Sincerely,

James M "Pat" Patrick

April 10, 2022

Emilie Franke  
Fishery Management Plan Coordinator  
1050 N. Highland Street, Suite 200 A-N  
Arlington, Virginia 22201

**RE: Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass**

Dear Ms. Franke,

I am writing to the Atlantic States Marine Fisheries Commission (ASMFC) to provide input on the Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass (herein referred to as Amendment 7).

I hold a Bachelor of Science degree in Environmental Science and Management from the University of Rhode Island, where I have used my skill set for the past eight (8) years to complete environmental permitting and reviews for large and complex public works projects. In my personal life, I have been an avid Striped Bass fisherman for close to 20 years. I make approximately 75 directed Striped Bass trips per year, and I have logged each one of my trips for several years. I have seen the peak of Striped Bass spawning stock biomass (SSB) of the mid-2000's, and I see where we are today, which I can only describe as a meager shadow of a once legendary fishery.

**There is a dire need for the ASMFC to take swift and aggressive action to rebuild the Striped Bass SSB back to target levels.** I, and many others, fear that if aggressive action is not taken with Amendment 7, then our generation could witness another collapse of the Striped Bass fishery. This is a real fear, since the ASMFC's 2018 Atlantic Striped Bass Stock Assessment indicates that SSB is at a 25-year low, young-of-year recruitment in the Chesapeake Bay has been at an all-time low in the past three years, and the SSB is overfished and experiencing overfishing. At this point, it is clear that the ASMFC has waited far too long to enact meaningful changes to the Striped Bass management plan- there is no more time to waste.

I hope this background about myself can help qualify the validity of my input on Amendment 7. Below please find my comments on each section of Draft Amendment 7:

**4.1 Management Triggers:**

Tier 1: Fishing Mortality (F) Triggers

- *Option A: Timeline to Reduce F to the Target*
- *Option B: F Threshold Triggers*
- *Option C: F Target Triggers*

**I support the status quo sub-options A1, B1, and C1.**

Reason: There is no defined need to change these management triggers. Draft Amendment 7 does not provide any back-up documentation or data to demonstrate why the ASMFC needs a additional time or data before taking steps to reduce F.

Tier 2: SSB Triggers



- *Option A: Deadline to implement a Rebuilding Plan*

**I support Sub-option A2:** “Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.”

Reason: The two-year deadline aligns with the rebuilding requirements under the Magnuson-Stevens Act. Swift action must be taken if an SSB-based management trigger is tripped. If this requirement were not put in place, there would be continued delay in rebuilding the Striped Bass SSB.

- *Option B: SSB Threshold trigger*

**I support Sub-Option B1 (status quo):** “If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].”

Reason: This is a critical management trigger that should not be adjusted. The ASMFC must take action to rebuild the SSB if it falls below the threshold.

- *Option C: SSB Target Trigger*

**I support Sub-Option C1 (status quo):** “If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].”

Reason: This is a critical management trigger for ASMFC to act upon that should not be adjusted. Controlling F is especially important if SSB is also below the threshold.

### Tier 3: Recruitment Triggers

- *Option A: Recruitment Trigger Definition*

**I support Sub-Option A2** “The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992- 2006, which represents a period of high recruitment, for three consecutive years. The high recruitment reference period used for this trigger may be adjusted as recommended by the TC during benchmark stock assessments. This trigger alternative has a moderate sensitivity; it is more sensitive than the status quo but less sensitive than sub-option A3.”

Reason: This sub-option strikes the best balance between the need to act upon this key management trigger while also addressing the inevitable variability of Striped Bass recruitment.

- *Option B: Management Response to Recruitment Trigger*

**I support Sub-option B2:** “If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.”

Reason: This sub-option sets clear guidelines for addressing the recruitment trigger when it is tripped. The status quo sub-option is too ambiguous and can unfortunately lead to deferred action on this critical management trigger.

#### Tier 4: Deferred Management Action

**I support Option A** (No Deferred Management Action) “If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.”

Reason: There is no reason to defer management action if a management trigger is tripped. In order to ensure Striped Bass are managed effectively, there should be absolutely no ability for the ASMFC to defer addressing management triggers. It should be common sense that if a fisheries manager wants to successfully manage a fishery, there should not be any ability to delay taking action when management triggers are tripped.

#### **4.2.2 Measures to Address Recreational Release Mortality**

- *Option A, Circle hook Status Quo*

**I support Option A**, the use of circle hooks on all natural baits, until more defined data is presented on the effectiveness of circle hooks.

- *Option B: Effort Controls*

Based on the lack of available science for estimating the mortality reductions from Effort Controls, **I do not support any proposals under Option B.**

The Amendment 7 public comment document states that “The [Striped Bass Technical Committee] TC has not established a standardized method for estimating the reduction in removals from a no-targeting closure.” This is a troubling statement. The ASMFC should not be proposing reduction measures with unknown benefits, especially when the non-targeting closures may cause significant adverse economic and community impacts. Any efforts to address recreation release mortality must be based on available science and be enforceable. Unfortunately, Option B lacks adequate science and will not be enforceable by individual States.

I contend that the (currently unknown) benefits of non-target closures are not strong enough to outweigh the socioeconomic impacts associated with them. Tackle shops, fishing charters, fishing tournaments, fishing clubs, marinas, and the communities built around these businesses, from Maine to Cape Cod to Virginia, will suffer greatly during the non-target closure periods. Disproportionate impacts will be felt by these communities in Northern States because the non-target closures will represent a greater portion of their season. I cannot support management proposals that fail to address these issues with legitimate data.

Furthermore, I have severe doubts that individual States have the resources to effectively enforce seasonal non-target closures. If they cannot be enforced, there is less likelihood that non-target closures will be effective at reducing striped bass mortality. In the decades I’ve spent fishing my home

waters, I have never seen an Environmental Protection Officer patrolling a stretch or shoreline besides the Cape Cod Canal.

- *Option C: Additional Gear Restrictions*

**I support both Sub-Option C1 and C2.** These are necessary gear restrictions that I believe will reduce Striped Bass mortality. I wish more restrictive measures were used such as prohibiting barbs on hooks and limiting the number of hooks/hook points per fishing plug.

- *Option D: Outreach and Education*

**I support sub-option D1.** This is a great use of taxpayer funds that can go a long way to reduce recreational release mortality. I believe most people are good and will do the right thing if shown the proper way.

#### **4.41 Recruitment Assumption for Rebuilding Calculation**

**I support Option B:** “Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.”

Reason: It is imperative to take swift and aggressive action to rebuild the Striped Bass SSB back to target levels. Based on the 2018 Benchmark stock assessment, which shows a disturbing trend of low recruitment, it is clear that the low recruitment option must be used to calculate F Rebuild.

#### **4.4.2 Rebuilding Plan Framework**

**I support Option B:** “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 recruitment assumption specified in Amendment 7) 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.”

Reason: This is a great Option to include in Amendment 7 because it gives the ASMFC the ability to react quickly and effectively if it is determined that Rebuilding may not be achievable by 2029.

#### **4.6.2 Management Program Equivalency**

I am whole-heartedly opposed to the use Conservation Equivalency for Striped Bass Management. Conservation Equivalency is a legitimate cancer to effective Striped Bass Management, and it is appalling at what types of Conservation Equivalency proposals have been approved by the ASMFC, especially when the Striped Bass Stock is overfished and experiencing overfishing. To me it was clear that Conservation Equivalency ensured the failure of the new slot limit that was recently proposed under Amendment 6—dropping the probability for Rebuilding to occur to below 50%. ASMFC must proceed with extreme caution when evaluating Conservation Equivalency proposals.

Conservation Equivalency absolutely must not be allowed when the Striped Bass Stock is overfished, or close to becoming overfished. Any Conservation Equivalency proposals must not use MRIP estimates with a high degree of uncertainty, and a robust uncertainty buffer must be built into any data used to develop a Conservation Equivalency proposal.

With that being said, I support all the most stringent sub-options under Management Program Equivalency. Therefore, I support:

- Sub-Option B1-a;
- Sub-Option C3;
- Sub-Option D-2; and,
- Sub-Option E2.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in cursive script that reads "Bryan Cordeiro".

Bryan Cordeiro

**John C. Sanchez**

221 West Euclid Avenue  
Haddonfield, NJ 08033

6 April 2022

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

Dear Ms. Franke,

Thank you for considering my public comment about the Amendment 7 to the Interstate Management Plan for the Atlantic Striped Bass.

While I am the legislative liaison for the Berkeley Striper Club and a club delegate to the Jersey Coast Anglers Association, I offer these comment on my own behalf.

I grew up in Queens, NY and began fishing for Atlantic Striped Bass 46 years ago when I was 10 years old. My father was a NYC police detective who worked midnight shifts covering homicides and major crimes and his normal workdays ended at 7a in the morning. During the summer, my mother, brother and I would excitedly wait for him to come home from the beach so to the beach to escape the heat. My dad would sleep, by mom would read books, my younger brother would play in the sand and I would surfcast. I was obsessed with the idea of catching a Striped Bass from the beach, but the odds were against me. Back then, I lacked knowledge, skill and access to the specialized equipment and relatively remote places where striped bass were being caught. The population of Striped Bass crashed around the same time I left for college at West Point, NY. While my service on active-duty military officer left me fewer opportunities to fish for Stripers, my passion never diminished.

After many years of effort, I finally caught my first Atlantic Striped Bass on Halloween in 2003 under the lighthouse at Montauk. The weather was crisp, the sky was deep blue and Autumn's color was in full display. By that time, the Striped Bass recovered from crash in the late 80's. My resources improved, and I could afford the cost of equipment and travel. More importantly, through the books, magazines, the internet and social media, I had access to more information than ever about how and where to fish for Striped Bass.

In the intervening 19 years, my success targeting and catching Striped Bass has improved considerably. Today I fish almost exclusively on a catch are release basis. In the spring and late fall I fish locally in New Jersey and in the summer and early fall I make trips north to Block Island, Cape Cod, Rhode Island and Montauk. Even with a declining population, I am able to reliably catch at least one Striped Bass on almost every trip between April and December.

My experience is not unique. Access to information and technology has exponentially expanded the capacity of fishermen to accurately and effectively target Striped Bass across their entire range. Advances in boating, electronics, clothing, carbon fishing rods, waterproof reels, braided super line and stronger, sharper and stronger hooks, better fishing lures improve the capacity off boat and shore-based fishermen to catch fish. The advances in technology substantially increase the pressure

Sanchez, John C Draft 7 Input 10 April 2022

on Atlantic Striped Bass.

“Little wonder that Striped Bass have been on a steady slide since at least 2005, when virtually every population indicator tracked at ASMFC turned negative years before the fishery was finally declared overfished in 2019. The Striped Bass Technical Committee of scientists were sounding alarms at least as early as 2011. The November 8, 2011 Striped Bass Management Board meeting minutes clearly documented warnings that the fishery was forecasted to be overfished by 2017.”

Even when public comments in 2013 and 2019 supported the more forceful measures to reduce Striped Bass mortality and increase female Striped Bass Spawning Stock biomass, the Board adopted solutions that only had a 50% chance of success. Even now, three years after the 2018 stock assessment confirmed that Striped Bass are over-fished and overfishing is occurring, the earliest expected action will not come until 2023 or possibly 2024. As a result, I do not have high-confidence in the judgement of the Board as stewards of this public resource and I am skeptical of the resolve board to independently act in a timely manner to fulfill its mandate and return the Atlantic Striped Bass stock to health.

In this context, my preference is for options that compel the Board to act quickly and forcefully. I prefer enforceable measures that carry a high level of certainty (certainty substantially better than coin-flip) to restore the Atlantic Striped Bass to good health in the shortest period. I do not support options that allow the Board discretion for inaction when the science indicates that action is required.

I support the following Draft Amendment 7 options:

#### **4.1 Management Triggers:**

Tier 1-Fishing Mortality Management Triggers

- Option A1
- Option B1
- Option C1

Tier 2-Female SSB Management Triggers

- Option A2
- Option B1
- Option C1

Tier 3-Recruitment Triggers

- Option A3
- Option B2

Tier 4 Deferred Management Action

- Option A

#### **4.2.2 Recreational Release Mortality**

- Option B-1a, B-2a
- Option C1
- Option C2
- Option D1

#### **4.4.1 Rebuilding Plan**

- Option B: Use low recruitment regime assumption

#### **4.4.2 Rebuilding Plan Framework**

- Option B

#### **4.6.2 Management Program Equivalency**

- Sub-Option B1a
- Sub-Option B2b
- Sub-Option B1c
- Sub-Option C3
- Sub-Option D3
- Sub-Option E2

Thank you again for your kind consideration.

Very Respectfully,

  
John C. Sanchez

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

Dear Ms. Franke and Striped Bass Board Members,

My name is Will Poston, and I will be commenting as a private angler—although I do work for the American Saltwater Guides Association. Thank you for this opportunity to comment on Draft Amendment 7. Additionally, I want to commend staff and many of the Commissioners, whom did a good job communicating this complex document and its issues to the public. I predominantly target striped bass with a fly rod and for the past several years have released every striped bass I catch. I am a Maryland resident and do fish for striped bass in the Chesapeake Bay, but mainly target striped bass on the Potomac River in DC's jurisdiction and in Massachusetts. Above all else, I want striped bass managed for abundance and am from the perspective that these fish are worth so much more in the water than in a cooler. That being said, I have kept striped bass in the past and enjoyed cooking it for friends and family, but that was a 28-inch fish—I see zero food value or economic value in bringing trophy sized fish back to the dock.

Additionally, I am cognizant of my impact as a catch and release angler, particularly my possible impact on spawning fish in the Potomac in DC—although, as a fly angler I can tell you I am far less efficient than the artificial or bait anglers. I have ethical issues with my own impact on these spawning fish and make every effort to safely and quickly release them. While I will address my preferred alternatives below, I would like to highlight my position on spawning closures as a means to reduce recreational release mortality. Without a doubt, we need to protect spawning striped bass while they are actively spawning, and many jurisdictions do this. However, one area that I think was not adequately addressed in this document was closures for staging areas. What's the point of a spawning closure if you can kill pre-spawn fish staging in the ocean a week before they spawn—when they are also more susceptible to being caught too. I believe this option needs to be expanded. For example, I would be supportive of harvest closures in all staging areas or in the ocean pre spawn. I'd also be supportive of a prohibition on anglers removing large, egg laden fish from the water during these spawning periods—much like tarpon regulations in Florida. However, I understand that these issues are not in the document, so please take it as a recommendation.

Thank you for your consideration and please recover this stock and manage it for abundance.

-Will Poston

#### 4.1 Management Triggers

Tier 1: Fishing Mortality (F) Triggers

Support Sub-option A1 (status quo)

Support Sub-option B1 (status quo)

Support Sub-option C1 (status quo)

Tier 2: Spawning Stock Biomass (SSB) Triggers



Support Sub-option A2  
Support Sub-option B1 (status quo)  
Support Sub-option C1 (status quo)  
Tier 3: Recruitment Triggers  
Support Sub-option A2  
Support Sub-option B2.  
Tier 4: Deferred Management Action  
Support Option A (status quo): No Deferred Management Action.

#### 4.2.2 Measures to Address Recreational Release Mortality

Support option A. SQ

Support an expanded and more developed option B2-a to include the entire coast, especially staging areas.

Support Sub-option C1

Support Sub-option C2.

Support Sub-option D2

#### 4.4 Rebuilding Plan

##### 4.4.1 Recruitment Assumption for Rebuilding Calculation

Support Option B

##### 4.4.2 Rebuilding Plan Framework

Support Option B

##### 4.6.2 Management Program Equivalency (Conservation Equivalency)

Support Sub-option B1-a

Support Sub-option C3

Support Sub-option D2

Support Sub-option E2



April 12, 2022

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

Re: Comments to Draft Amendment 7

Thank you for the opportunity to comment on the Draft Amendment.

Over the past three decades, we have watched the collapse of many recreational target species in the Northern and Mid-Chesapeake Bay region. Flounder, sea trout, weakfish, and croaker have largely disappeared – and as such, the striped bass are singled out by both the recreational and commercial sectors. Significantly, the recruitment indices for striped bass in Maryland have exhibited a steady decline over the past twenty years. With changes in habitat, increased angler pressure, and invasive species in the region all negatively affecting the biomass, a more conservative management approach is long overdue. Proactive, conservative action that focuses on the ‘fish first’ is required immediately. Our preferred options are listed below:

Section 4.1 Management triggers:

Tier 1: Mortality (F)

Option A – Timeline

Sub-Option **A1**

Option B – F Threshold

Sub-Option **B1**

Option C – F Target

Sub-Option **C1**

Tier 2: Spawning Stock Biomass (SSB) triggers

Option A – Deadline to implement rebuilding plan

Sub-Option **A2**

Option B – SSB Threshold

Sub-Option **B1**

Option C – SSB Target

Sub-Option **C1**

Tier 3: Recruitment triggers

Option A – Recruitment trigger definition

Sub-Option **A2**

Option B – Management response

Sub-Option **B2**

Tier 4: Deferred management action

Option **A** – No deferred action



Section 4.2 Addressing recreational release mortality

Option B – Closures

Sub-Option **B2-b**

Note: This section deserves greater scrutiny and improved data sourcing that incorporates updated stock assessment data. Regardless of these issues, closures of critical spawning ground should be *expanded*, and closures/no-targeting regulations *enforced*, to maximize recruitment returns going forward.

Option C – Gear

Sub-Option **C1**

Sub-Option **C2**

Option D – Outreach and education

Sub-Option **D1**

Section 4.4 Rebuilding plan

4.4.1 – Recruitment assumptions

Option **B**

4.4.2 – Rebuilding plan framework

Option **B**

Section 4.6.2 Management program equivalency

Option B – restrict use of CE based on stock status

Sub-Option **B1-a**

Option C – precision in MRIP used in CE proposals

Sub-Option **C3**

Option D – Uncertainty buffer

Sub-Option **D3**

Option E – Equivalency

Sub-Option **E2**

Note: - If the concept of ‘Conservation Equivalency’ is to exist at all, the use must be carefully restricted and if conditions warrant only applied under conservative conditions.

**Conclusion:**

We are at an inflection point in the management of striped bass. Management must act in a timely, effective, and science-driven manner to rebuild the stock. Our hope is that with this new Amendment, a more proactive and conservation-focused management regime can focus on restoring and preserving the striped bass.

Sincerely,

Mark Eustis,  
Managing Director.

## Amendment 7 Striped Bass

Capt. Earl Evans

97 Harrison Ave

Newport, RI 02840

Thank You for taking the me t o listen to these public comments. I appreciate you taking the steps to add recruitment triggers and restricons t o Conservaon Equivalency. I've been fishing for striped bass for 30 years and it was clear a. er 2010 that there was a problem. We almost lost striped bass once, let's not do it again. We stated this after the 2018 benchmark stock assessment but instead of the most conservav e acon y ou "kicked the can" and here we are today. We've allowed conservaon equiv alence to be abused by Maryland that wiped out our savior 2011 year class and there was no penalty. MD and NJ were responsible for 73% of total recreaonal har vest and many of these fish are below 28", the minimum size to have spawned at least once.

It is esma ted that the recreaonal s triped bass fishery is worth \$7.7 Billion and supports 105K jobs. These fish are worth more alive than dead. Now is the me t o act.

Here are the opons I choose:

Tier 1: Fishing Mortality Triggers

Sub Opon A1

Threshold Triggers:

Sub Opon B1

Target Triggers:

Sub Opon C1

Tier 2:SSB Triggers

Sub Opon A2

SSB Threshold Trigger:

Sub Opon B1

SSB Target Trigger:

Sub Opon C1

Recruitment Trigger:

Sub Opon A2

Management Responses to Recruitment Trigger:

Sub Opon B2

Tier 4: Deferred Management Acon

Opon A – No de ferment

Recreaonal R elease Mortality:

Sub Opon B2 – Seasonal Closur es

Sub Opon C1

Sub Opon C2

Outreach and Educaon:

Sub Opon D2

Recruitment Assumpon f or Rebuilding Calculaon:

Opon B

Rebuilding Plan Framework:

Opon B

Management Plan Equivalency:

Sub Opon B1-A

Sub Opon C3

Sub Opon D2

Sub Opon E2

Before you make any decisions, please think of your children and your children's children. What will be left for them? As it is, we can't control environmental impacts. We can control the mortality rate.....please do the right thing.

**Edward “Ted” Purcell**  
**15 Sassawanna Road**  
**Rutland MA 01543**

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

To whom it may concern:

I appreciate the opportunity to submit written public comment on Draft Amendment 7 of the Striped Bass Management plan. I have been fishing the salt waters since I was a child in the 1960s, I am a science teacher in the public schools, I have been involved with conservation efforts through CCA and Stripers Forever (SF). I have met with Director Mckiernan and Dr. Armstrong testified before Senator Peake and have a lifetime of anecdotal observations related to striped bass and have closely followed the science over the past 30 years. “Follow the science” was what ASMFC as well as state regulators have said for years. Anecdotal observations in the mid 2000s started hinting that striped bass were in trouble again and now the science has clearly confirmed this. Too many striped bass are being harvested by recreational and commercial fishermen and there are problems in the breeding areas for striped bass.

I see Amendment 7 as a step in the correct direction, but have concerns that it does not act quickly enough to put in place the measures needed to return striped bass to the thriving species it was prior to the collapse in the 1970s and in the late 1990s and early 2000s. My personal opinion is that an immediate moratorium of at least 3-5, better 10 years during which time research into the impact of commercial harvest of breeding sized fish, recreational impact and issues related to climate change and pollution in spawning areas is completed without the mortality pressure. As a moratorium seems unlikely, I would make the following comments directly at portions of Draft Amendment 7.

Measures to reduce “F” (Fishing Mortality Rate) should be implemented as quickly and conservatively as possible. In terms of Mortality Triggers, Sub options A1, B1 and C1 are in my opinion the best options short of a moratorium. By having mortality triggers in place based on assessments there would be less of a time lapse to implement reductions.

In terms of the SSB (Spawning Stock Biomass) measures, two years is too long! This is perhaps where a moratorium would best give the fish the opportunity to restore the stock. Of the options laid out in Amendment 7, I feel that sub-options A2, B1 and C1 chart the best course of the sub-options provided. A2 at least sets a deadline for a plan based on data. B1 and C1 offer the most conservative timeframes and this path is clearly warranted by current anecdotal observation and scientific data.



There are references to Deferred Management Actions. This cannot and must not take place, thus I favor Option A. Striped Bass are clearly in crisis. When any trigger is tripped there must be a response.

Section 4.2 Recreational Fishery Management Measures deserves great attention. I have been, and still am a proponent of gamefish status for striped bass. This fishery simply is too valuable to our economy (the way redfish, bonefish and tarpon are in other regions) to warrant commercial harvest. That being said, recreational angling (and anglers) are not without culpability. Seasonal closures, gear restrictions and outreach and education are all measures necessary to keep striped bass viable. Sub-options B2 and B2-b make sense in order to relieve pressure on fish during the spawn. Gear restrictions including non-lethal removal methods and circle hooks are a must. These are not new and I have used materials Dr. Armstrong shared with me 15 years ago to try and educate fellow anglers, many from my son's generation. C1, C2 and D1 make the best sense to me.

Section 4.4, rebuilding plan, offers some opportunity to address issues that Addendum 6 never addressed. 4.4.1 and 4.4.2 both have an option B which I would favor. Trying to achieve a rebuilt population by 2029 likely could be achieved with a complete moratorium, but short of that, these two options have the best potential. Lastly I would like to address Conservation Equivalency (CE). Please reconsider this as a management tool and drop any use of CE. Short of that options B1, C3, D3 and E2 are options that in my mind make most sense if CE is to remain.

I appreciate the opportunity to make public comment. I remain hopeful that you will reconsider options and implement a temporary moratorium so that this can be better thought through more research completed and help keep wild striped bass swimming in the Atlantic. Short of that please implement the options above and others that are most conservative in nature.

Sincerely,

Edward "Ted" Purcell  
Rutland MA 01543  
CC: Anne Gobi  
Kim Ferguson  
Mike Armstrong  
Dan Mckiernan  
Sarah Peake  
Raymond Kane  
Lowell Whitney

Dear ASMFC board members,

My name is Blaise Jenner, I am a recreational saltwater angler from Maine who is very concerned about the direction the striped bass fishery is taking. I have a bachelor's degree in marine science from the University of New England and work as a marine biologist. As a fisherman based in the beautiful state of Maine, we are in the position to observe the striped bass at their northern range, this makes the Maine something as a bellwether. Fishermen in here have been watching for years as alarming signs emerged surrounding the health of the fishery. Now every state from Maine to North Carolina knows what is happening, striped bass stocks are declining. The stock assessment says it, and so does the anecdotal evidence that fishermen like me collect everyday we spend on the water. Now is the time to take action to protect this invaluable, iconic and wonderful species.

Below you will find my comments on the draft amendment 7, thank you for your time.

#### **4.1 Management Triggers**

##### **Option A: Timeline to Reduce the F to the Target**

###### **I support Sub-option A1 (status quo)**

I believe it is one of the most difficult tasks of fisheries managers to work quickly when a new stock assessment or new peer reviewed data is published, but I also feel that being able to react and implement action is paramount to successfully bring striped bass stocks back to health levels. Therefore, it is important to reduce the fishing mortality to the target within one year, allowing two years to reduce mortality is just too slow of a response.

##### **Option B: F Threshold Triggers**

###### **I support Sub-option B1(status quo)**

As stated above, we unfortunately do not have the luxury to wait any longer than necessary to trigger action by the board, thus, option B1 makes the most sense.

##### **Option C: F Target Triggers**

###### **I support sub-option C1(status quo)**

Similar to the above options, option C should stay status quo, first of all, to have consistency with the previous choices. Second, it is important to draw attention to the relationship between fishing mortality and female SSB.

#### **Tier 2: SSB Triggers**

##### **Option A: Deadline to Implement a Rebuilding Plan**

**I support sub-option A2:** Having a two-year deadline to implement a rebuilding plan is an extremely important element of Amendment 7. Striped bass were declared overfished almost 3 years ago in 2018, currently no rebuilding plan has been accepted, hopefully this option would help avoid such a delay in future. Additionally, a two-year deadline lines up with federal management and the Magnuson-Stevens

Act, any option that brings us closer to federal management will help striped bass populations over time.

#### **Option B: SSB Threshold Trigger**

**I support sub-option B1 (status quo):** If the striped bass stock becomes overfished, it needs to be turned around as soon as possible and not exceed 10 years.

#### **Option C: SSB Target Trigger**

**I support sub-option C1 (status quo):** If SSB declines below the target then the board should respond as quickly as possible. Controlling the fishing mortality is one of the best ways to ensure sustainability and stability in the stock.

### **Tier 3: Recruitment Triggers**

#### **Option A: Recruitment Trigger Definition**

**I support sub-option A2:** Striped bass recruitment has been documented to be at low levels many years in recent history, and despite the low recruitment, the trigger has never been tripped for the coastal stock. If the recruitment can be as such low levels without tripping a trigger, then it is not really a trigger at all. Sub-option A2 strikes a good balance between never being tripped and sub-option A3, which according to retroactive analysis it would have been tripped 6 times since 2003. Sub-option A3 may be too sensitive and triggering board intervention too often.

#### **Option B: Management Response to Recruitment Trigger**

**I support Sub-option B2:** This option lines up with the previous sub-option, striped bass management must be responsive to recruitment levels. Lowering fishing mortality as a response to low recruitment just makes too much sense. Too many times in the past, healthy year classes have been exploited while periods of low recruitment are not addressed.

### **Tier 4: Deferred Management Action**

**I support option A (status quo):** This is pretty simple, management action cannot be delayed any longer, the status quo option ensures that action will not be delayed if the trigger is tripped.

#### **4.2.2 Measures to address recreational release mortality**

I believe that recreational release mortality is an important aspect of striped bass management and it represents a large portion of the total fishing mortality. However, with the uncertainty around angler behavior and even the rate of post release discard mortality I currently do not support targeted closures. Thinking about the enforcement of this rule, as well as the impact to the local economy and guiding businesses I don't feel that closures are appropriate at this time.

**I support sub-option C1 and sub-option C2:** With the concern around release mortality and the fact that the majority of striped bass caught in the recreational fishery are released using nonlethal devices to remove a striped bass from the water is the only thing that makes sense. It is imperative that fish both in and outside the slot limit can be safely released back to the water, and using tools such as a gaff goes against the goal of lowering release mortality.

#### **Option D: Outreach and Education**

**I support sub-option D2:** Considering 90% of striped bass that are caught recreationally are released, educating anglers to promote best handling and release practices would be a great step in the right direction.

### **4.4 Rebuilding Plan**

We have known since the last stock assessment that the striped bass stock was in trouble, unfortunately rebuilding was not addressed at the time. If action had been taken sooner the 2015 year class which was a strong year class of fish could have been better protected. Instead of initiating a rebuilding plan, its 3 years later and not enough has been done to rebuild to stock.

#### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

**I support option B:** The last three years of recruitment in the Maryland portion of Chesapeake Bay are the lowest they have been historically since 1979-1981, using a low recruitment regime better accounts for the situation we are currently facing.

#### **4.4.2 Rebuilding Plan Framework**

**I support Option B:** As I have stated previously, striped bass management needs to happen on a faster time scale with fewer delays and impediments. With the updated stock assessment scheduled to come out in October of this year, option B will allow the board to address potential changes that are needed based on the updated data from the stock assessment. This option will allow removals to be changed prior to the 2023 season, and every extra year that we can allow striped bass to be rebuild is important.

#### **4.6.2 Management Program Equivalency**

Conservation equivalency may be the most abused and most detrimental aspect of striped bass management. By allowing CE's to be used, several states have been able to not meet conservation goals and remove far too many fish from the water, thus only further hampering the ability for the stock to be rebuilt.

#### **Option B: Restrict the used of conservation equivalency based on stock status**

**I support sub-option B1a:** CE programs should not be approved when the stock is being overfished and should not be considered until biomass is above the threshold level. CE adds risk, and uncertainty to fisheries management, which is already riddled with uncertainty. Therefore, it is simple, CE should and cannot be used when the stock is overfished or overfishing is occurring.

This is an absolutely critical time in striped bass management. Through history we have seen the stock go from historical lows in the 1980's to the high point in the early 2000's, now we are quickly sliding back toward an extremely low stock biomass. There are many choices that can and will have to be made in the coming months and years, and while uncertainty is inherent to fisheries management, there is one thing that is not uncertain. Action must be taken as rapidly as possible to protect one of the most important and iconic gamefish species in North America. The future of this species is in all of our hands, let's take advantage of this opportunity to turn the stock around, and not let history repeat itself.

Thank you,

Blaise Jenner

Thank you for the opportunity to comment. I am a recreational fisherman fishing the Raritan Bay and ocean around Sandy Hook, NJ.

Thomas Devine, 42 Majestic Ave, Lincroft, NJ 07738 732-530-2811

There are three ways the council can regulate to increase the available biomass of striped bass:

- 1.) Increase the number of striped bass spawned each year.
- 2.) Reduce the number of fish removed each year.
- 3.) Reduce the mortality of released fish.

Other ways such as reducing water pollution are beyond the scope of the council. Even changing other species regulations to benefit striped bass, such as increasing the yield of spiny dogfish are difficult to quantify and become argumentative.

While regulations will always be necessary, I would like regulations which not only reduce the harvest but have a multiplying effect by increasing the number of bass spawned each year or reduce the mortality of released bass.

In addition, I comment on that the sustainable target should be less than 125% of threshold. Do not transfer any unused recreational allotment to commercial fishing. Lower the mortality factor and implement trawler surveys in the Raritan B/Sandy Hook area.

### **Increase the number of Striped Bass Spawned Each year**

I would like to see Amendment VII increase the focus on improving the number of bass spawned each year.

1. I would like to see pilot programs to rear and stock striped bass.
2. I would also like to see further regulation aimed at preventing the taking of large female bass to improve the quality of the spawning biomass.

### **Implement Stocking Programs**

While stocking may have only a small effect on the massive Chesapeake Bay, it may be able to provide a valuable resource to smaller rivers and bays. For instance, could stocking in the Mullica River and lower Barnegat Bay improve fishing opportunities in Southern New Jersey where striper abundance has declined over the past years. Or can we revitalize rivers in Connecticut and Rhode Island. Remember, just a small number of striped bass from the Navesink River in 1879 began the West Coast striper fishery that exists today. Sometimes you have to start small.

Section 3.6 specifically states that no stocking program is included but gives no reason why.

### **Reduce/Eliminate the Taking of Large (female) Striped Bass**

We would like to see the maximum length currently in place for most state recreational fisheries be extended to all states for recreational and commercial fisheries. This is consistent with plan objective “2.4.7. Establish a fishing mortality target that will result in a net increase in the abundance (pounds) of age 15 and older striped bass in the population, relative to the 2000 estimate”.

A maximum size in addition to the existing minimums creates a “slot”. Slot fish are perceived to have improved the stock of other species such as snook in Florida. As size increases the number of spawned eggs also increases. Therefore, protecting the larger fish, increases the number of eggs spawned and should increase the young of the year”.

All state recreational fisheries, except for Maryland, have maximum length limits, see Table 10 in the Amendment VII report. Catches over 35-38” are often referred to as “trophy” fish in Maryland. Due to the age of trophy fish, they are usually inferior table fare. With cell phone pictures and length and girth measurements, an accurate fiberglass model can be easily created for those trophy fishermen. So, is there a need to harvest these “trophy” fish? Let’s return them as valuable breeders.

The commercial regulations for several states have no upper limit in contrast to the recreational limits, Table 9. (MA, DE, MD, VA, and NC). Massachusetts is particularly perplexing as they limit recreational catch to 35” and require commercial catch to be over 35”. The “good” of one is offset by the other Please enhance the effort to preserve large breeder fish by limiting commercial size to an upper limit, or slot, just like recreational.

Enforcing upper size limits can always run afoul of “states rights”. States can use “equivalency” to justify the taking of these large fish. One approach to discourage this is to recognize that large fish play an enhanced role in spawning. Therefore, allowing harvesting these large fish would require a greater offset in any equivalency calculations.

### **Reducing the mortality of released fish**

The recreational requirement for in-line circle hooks for bait fishing should be extended to any rod and reel commercial fishing. Commercial can be done by rod and reel. In Massachusetts, rod and reel commercial fishermen are only allowed to harvest fish over 35 inches, but they are not required to use in-line circle hooks with bait. Since any rod and reel release, recreational or commercial, will have the same mortality, they should both use the same conservation-minded inline circle hooks for bait fishing.

One other conservation measure in the Amendment VII draft might be limiting use of non-single hooks, usually treble hooks. While treble hooks are often used on artificial lures, limits on treble hooks should also improve mortality. Any regulation on treble hooks does not have to be “all-or-nothing”. A regulation could limit an artificial lure to no more than on treble hook.

### **Target should be less than 125% of threshold**

The draft amendment states on page 11, "The latest science also indicates that the SSB target has never been reached which raises questions that it may be an unreasonably high management target." We should not be expected to manage to a level that we have never demonstrated. That is setting up for repeated failure. When the threshold is not met, the plan requires measures that will achieve the target. The target is overly optimistic.

A "good" target is reached and occasionally exceeded. However, the current target has never been reached. Therefore, it is not a good target. Unfortunately, when the SSB model predicts we are below the threshold, steps must be taken to return to the (poorly chosen) target not the threshold.

A "better" target should be based on the estimated SSB from 1995 through 2012. These are the years when we were above the threshold. Using the average of those years would give a target which was demonstrated for 17 years. A target in the neighborhood of 112% would be more reasonable. This does not require a change to the threshold.

### **Do not transfer recreational quota to commercial**

I strongly oppose considering commercial quota transfers (4.3.2.1 Commercial Quota Transfers). Transfers are not currently allowed, but they are noted to be considered in May 2022, after our comment period has ended! New Jersey has closed their waters to commercial fishing for striped bass. Do not subvert the gamefish status of New Jersey by transferring their quota to another state.

The stated purpose of the council is to maintain a sustainable fishery for recreational and commercial. Maximizing commercial harvest (by transferring quotas) is not a stated objective. Furthermore, the draft states that commercial interests remove 20% of the fish and contribute 3% of the economic value (1.5.2.1). Any recreational underage would be far more valuable to "bank" for future years when it can be properly added to the recreational sector where it creates a much high return on fish caught.

### **Reduce the Scope of the Bycatch Program 3.7**

This is a very ambitious program. It covers bycatch and fish mortality. Eliminating some of the objectives could reduce costs which might be used to support a striped bass stocking program which is suggested elsewhere in my comments. Others such as determining bycatch and mortality of commercial fishing are very valuable.

Specifically, it seems that effort to identify the percentage of fly, bait, treble hook, and circle hook fishing for recreational and for-hire fishing is of marginal value. Circle hooks will be used for live bait by regulation. We've done all we can there. Flyfishing is a low percentage of all recreational and for-hire fishing. Just implement regulations for treble hooks on lures, no study is needed.

### **Reduce the mortality factor below 0.09**



The current mortality factor equals that suggested by single study conducted in a 5 acre saltwater pond with an average depth of 10 ft. (Diodati and Richards 1996 <https://www.mass.gov/doc/diodati-and-richards-1996/download>). Many striped bass are caught in the open ocean that provide cooler waters with a higher survivability. The Diodati and Richards study also included live bait fishing with traditional J hooks. Circle hooks were not used in 1996. Now the mandatory use of circle hooks for live bait, will have a positive effect on mortality compared with that study. How much the factor should drop could be argued at length. Rather, a “good faith” drop to 0.07 (about 20% change) would be welcomed in recognition circle hooks and ocean fishing compared with the 1996 study.

**Establish trawl survey of the Raritan Bay/Sandy Hook, NJ area**

The Raritan Bay, Lower New York Bay and the ocean in the area of Sandy Hook has had a very strong striped bass fishery in recent years. However, the number of fish in this area is estimated by trawls from the Delaware Bay. (From one of the Amendment VII webinars.) I believe that the spawn from the Hudson River and other smaller rivers that feed the Lower New York Bay, the Raritan Bay, and the Sandy Hook Bay may be much larger than anyone has estimated. Amendment VII should call for trawls of this area.

**Lee Solomon**

**Chief Meteorologist**

**Hearst Television**

**KSBW Action News 8**

**Salinas CA 93901**

**April 12 2022**

**Emilie Franke**

Atlantic States Marine Fisheries Commission

1050 N. Highland Street,

Suite 200 A-N

Arlington, VA 22201

I hope that the trust we have put into your agency to do what's right to repair this fishery is not in vain. It has been done before in recent memory. Times have changes but the stiped bass has not. A moratorium or a one at 36 would probably do it! As a scientist I appreciate all the hard work you have all done. Yes, I read all 113 pages!!!

I grew up in Freeport Long Island. Been fishing since I was 5. Moved to California at age 33. I make upwards of 4 trips per year to fish my home waters of Long Island every year. My whole family are die hard fisherman. All species.

When I moved to California in 2002 I bragged to all my new fishing friends on the west coast about the world class striped bass fishery in Montauk.

Starting in 2005 I have been taking 2-4 people back to fish my home waters every year. We even bought our own truck to have to use on the beaches. Each year we each spend in excess of 4-5 thousand dollars each on hotels, guides, boats, trucks, gas, meals flights etc.. We inject major dollars into the local economy when we travel and we are not the only ones who make this journey. You might be surprised!

The fishery has been steadily declining since 2005. Every year it's a little bit worse. Last year I brought a new guy with us who is a rod builder here on the west coast. What a disappointment that was. Just so you know. I am very experienced, have placed in tournaments and been asked o fish tournaments with striper guides. I know my stuff and still catch fish but what was a "world class" fishery, is now a joke.

The guys who have been coming with me now for 17 years have decided no more. Jut not worth the time, energy and money to fish Long Island waters anymore. How sad. Montauk is a special place to me and always will be but a fishing destination for striped bass **it is not**.

Here are my 2 cents

Tier 1: Fishing Mortality Triggers

Sub Option A1

Threshold Triggers:

Sub Option B1

Target Triggers:

Sub Option C1

Tier 2:SSB Triggers

Sub Option A2

SSB Threshold Trigger:

Sub Option B1

SSB Target Trigger:

Sub Option C1

Recruitment Trigger:

Sub Option A2

Management Responses to Recruitment Trigger:

Sub Option B2

Tier 4: Deferred Management Action

Option A – NO DEFFERMENT!

Recreational Release Mortality:

Sub Option B2 – Seasonal Closures

Sub Option C1

Sub Option C2

Outreach and Education:

Sub Option D2

Recruitment Assumption for Rebuilding Calculation:

Option B

Rebuilding Plan Framework:

Option B

Management Plan Equivalency:

Sub Option B1-A

Sub Option C3

Sub Option D2

Sub Option E2

Tier 1: Fishing Mortality Triggers

Sub Option A1

Threshold Triggers:

Sub Option B1

Target Triggers:

Sub Option C1

Tier 2:SSB Triggers

Sub Option A2

SSB Threshold Trigger:

Sub Option B1

SSB Target Trigger:

Sub Option C1

Recruitment Trigger:

Sub Option A2

Management Responses to Recruitment Trigger:

Sub Option B2

Tier 4: Deferred Management Action

Option A – NO DEFERMENT!

Recreational Release Mortality:

Sub Option B2 – Seasonal Closures

Sub Option C1

Sub Option C2

Outreach and Education:

Sub Option D2

Recruitment Assumption for Rebuilding Calculation:

Option B

Rebuilding Plan Framework:

Option B

Management Plan Equivalency:

Sub Option B1-A

Sub Option C3

Sub Option D2

Sub Option E2

Thank you for your time and God bless

Sincerely,

Lee Solomon

April XX, 2022

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

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board (Board):

Thank you for the opportunity to comment on Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass. On behalf of conservation-minded fishing guides, charter boat captains, small fishing-related businesses, and anglers who rely on a robust striped bass population for income and recreation, we urge the Board to take decisive action to rebuild the fishery and establish management reforms that position the Atlantic striped bass stock for long-term abundance and stability. The need for such action is especially critical given that spawning stock biomass is at a 25-year low<sup>1</sup> and that the three most recent young-of-year indices in upper Chesapeake Bay are among the lowest on record.<sup>2</sup> While the draft amendment includes much-needed changes to improve the outlook for striped bass, it also includes potential pitfalls, particularly on the topic of management triggers, that raise concern. In the paragraphs below, we outline our positions on each of the decision points for the four major issues contained in the draft amendment.

#### **4.1 Management Triggers**

With one notable exception, we are supportive of maintaining the status quo for the spawning stock biomass and fishing mortality triggers contained in the striped bass management plan. However, there are key opportunities to improve both the mechanics of the recruitment trigger and the specifics of needed Board action should the recruitment trigger be tripped.

##### **Tier 1: Fishing Mortality (F) Triggers**

Option A: Timeline to Reduce F to the Target

*Preferred Alternative—**Sub-option A1** (status quo): Reduce F to a level that is at or below the target within one year.*

Rationale: The Board should continue to need to take rapid action to curb overfishing. This need is magnified when taking into account the built-in lag in the Board's response time to end overfishing once the trigger is tripped; for example, despite the Board's learning in April 2019 that the stock was experiencing overfishing, the Addendum VI process precluded the ability to reduce fishing mortality until its measures were enacted for the 2020 fishing season.<sup>3</sup> Any further delay in action would only increase the risk to the stock.

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<sup>1</sup> ASMFC. 2019. Summary of the 2019 Benchmark Stock Assessment for Atlantic Striped Bass.

[http://www.asmfc.org/uploads/file/5d28f18dAtlanticStripedBassAssessmentSummaryReport\\_April2019.pdf](http://www.asmfc.org/uploads/file/5d28f18dAtlanticStripedBassAssessmentSummaryReport_April2019.pdf).

<sup>2</sup> Maryland Department of Natural Resources. October 15, 2021. Chesapeake Bay 2021 Young-of-Year Survey Results Announced. <https://news.maryland.gov/dnr/2021/10/15/chesapeake-bay-2021-young-of-year-survey-results-announced/>.

<sup>3</sup> ASMFC. 2019. Addendum VI to Amendment 6 to the Atlantic Striped Bass Interstate Fishery Management Plan. [http://www.asmfc.org/uploads/file/5dd447baStripedBassAddendumVI\\_Amend6\\_Oct2019.pdf](http://www.asmfc.org/uploads/file/5dd447baStripedBassAddendumVI_Amend6_Oct2019.pdf).

#### Option B: F Threshold Triggers

*Preferred Alternative—**Sub-option B1 (status quo):** If  $F$  exceeds the  $F$  threshold, the striped bass management program must be adjusted to reduce  $F$  to a level that is at or below the target within the timeframe selected under Option A.*

Rationale: While we recognize that there is some uncertainty around only one year of recreational data collected through the Marine Recreational Information Program (MRIP), we prefer to take a precautionary approach to the resource should there be indicators that overfishing is occurring. Furthermore, if a two-year timeline were adopted (Sub-option B2), and the first year occurred in the terminal year of a stock assessment, the actual timeline for action could be even longer, even as overfishing may continue to occur.

#### Option C: F Target Triggers

*Preferred Alternative—**Sub-option C1 (status quo):** If  $F$  exceeds the  $F$  target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce  $F$  to a level that is at or below the target within the timeframe selected under sub-option A.*

Rationale: This option better aligns with the status quo options selected for Options A and B and denotes a relationship between  $F$  and SSB.

### **Tier 2: Spawning Stock Biomass (SSB) Triggers**

#### Option A: Deadline to Implement a Rebuilding Plan

*Preferred Alternative—**Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan** The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment.*

Rationale: The implementation of a two-year deadline to implement a rebuilding plan is the one change to the  $F$  and SSB triggers that we support. While the Board took action to curb overfishing through Addendum VI, it has yet to explicitly confront the challenge of rebuilding the stock despite the fishery management plan's requirement to do so within 10 years (i.e., by 2029) despite learning that the stock was overfished in April 2019. A two-year deadline would compel the Board to act swiftly to rebuild the stock while also aligning with the rebuilding requirements for federally managed fisheries under the purview of the Magnuson-Stevens Act.

#### Option B: SSB Threshold Trigger

*Preferred Alternative—**Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].*

Rationale: We see no need to remove the SSB threshold trigger at this time. The health of the striped bass stock is measured by SSB, and managers must take action if it declines to unhealthy levels.

#### Option C: SSB Target Trigger

*Preferred Alternative—**Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped*



*bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].*

Rationale: Controlling F is always important, but especially so if it is associated with a decline in SSB.

### **Tier 3: Recruitment Triggers**

#### **Option A: Recruitment Trigger Definition**

*Preferred Alternative: **Sub-Option A2:** The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA) shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years. The high recruitment reference period used for this trigger may be adjusted as recommended by the TC during benchmark stock assessments. This trigger alternative has a moderate sensitivity; it is more sensitive than the status quo but less sensitive than sub-option A3.*

Rationale: Both Sub-option A2 and Sub-option A3 provide much-needed increases in sensitivity of the recruitment trigger in order to detect not just outright failure, but also periods of mediocre recruitment that necessitate a reduction in F. Modifying the juvenile abundance indices considered to include only those used in the stock assessment model to estimate recruitment is also a sensible adjustment. Sub-option A2 represents an intermediate sensitivity alternative that will inform the Board when recruitment is lackluster and in need of being considered. But it is not so sensitive as to be overly burdensome to managers while disregarding the inherent interannual variability in striped bass recruitment. Furthermore, we are concerned that if the recruitment trigger tripped too often, it could be more easily dismissed by both members of the Board and stakeholders.

#### **Option B: Management Response to Recruitment Trigger**

*Preferred Alternative—**Sub-option B2:** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.*

Rationale: Both Sub-option B2 and Sub-option B3 address the urgent need to provide additional, specific guidance for Board action should the recruitment trigger be tripped. Adjusting the F target—and then adjusting F, if necessary—is an appropriate approach to account for fewer young striped bass entering the fishery.

### **Tier 4: Deferred Management Action**

*Preferred Alternative—**Option A (status quo):** No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.*

Rationale: In order to maximize the chances of achieving a robust striped bass stock, the Board must continue to respond to management triggers as they are tripped.

#### **4.2.2 Measures to Address Recreational Release Mortality**

Recreational release mortality has long been a part of the striped bass fishery, which is to be expected in a fishery that is primarily recreational and primarily catch-and-release. As the draft amendment mentions, roughly 90% of striped bass caught recreationally since 1990 have been released, even as regulations and abundance have fluctuated, underscoring the value that many anglers place on the catch and release experience.

We recognize that by the best estimate recreational release mortality accounts for approximately half of striped bass fishing mortality and understand the need to share burdens equitably among users of the striped bass resource when it comes to recovering and conserving the stock. However, in enacting measures to reduce recreational release mortality, we insist that any actions taken must be a) quantifiable, b) enforceable, and c) science-based. At the same time, we continue to promote the need to better educate anglers on actions they can take to improve the survivability of released fish.

### **Option B. Effort Controls (Seasonal Closures)**

We do not support the inclusion of seasonal closures in Amendment 7, not because we unconditionally oppose the concept of limiting effort to reduce recreational release mortality, but because the options being put forth at this time do not meet the criteria included above.

We oppose the concept of state-specific two-week closures (Sub-option B1) because of the disproportionate share of the burden (fishing opportunity and economic) that would shift to more northern states with shorter fishing seasons, even as those states' waters typically have conditions more conducive to striped bass post-release survival (e.g., lower temperature, higher salinity, higher dissolved oxygen).

We are also opposed to the implementation of no-targeting closures at the time—either at the two-week state-specific level (Sub-option B1) or for spawning areas (B2-b)—both because the conservation impact of such closures could not be quantified and because of enforceability concerns. As the draft amendment states, estimating the benefit of no-targeting closures depends on assumptions about how angler behavior might change, which is highly uncertain, and the striped bass Technical Committee has yet to establish a method for estimating the reduction in mortality resulting from no targeting closures. Until such a methodology is implemented, no-targeting closures would largely be punitive to the catch-and-release striped bass angling community with no tangible benefit for the resource. Furthermore, no-targeting closures present an intractable enforcement challenge<sup>4</sup> given that the burden is on the law enforcement officer to prove intent of target species (e.g., similar methods used to target striped bass are also used for bluefish in marine environments and catfish in estuarine environments). Lastly, several producer areas have robust commercial seasons (gillnet and haul seine fisheries) during the early part of the spawning run. If the intent of these proposed measures is to ensure a safe passage during the spawn, it is counterintuitive that these would be recreational-only measures.

We do understand the potential benefit that could arise from sub-option B2-a, no-harvest spawning closures, and would support further development of this alternative outside of the current Amendment 7 process. While we recognize that many states and jurisdictions have already implemented such closures, the draft amendment contains no maps indicating what new spawning

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<sup>4</sup> ASMFC. January 26, 2022. Atlantic Striped Bass Draft Amendment 7 for Board Review. Presentation to the Atlantic Striped Bass Management Board.  
[http://www.asmfc.org/files/Meetings/2022WinterMeeting/AtlanticStripedBassBoardPresentations\\_Jan22.pdf](http://www.asmfc.org/files/Meetings/2022WinterMeeting/AtlanticStripedBassBoardPresentations_Jan22.pdf).

area closures would look like. Without that information, it is difficult for the public to provide meaningful input. For example, should these closures only apply to areas where striped bass are actively spawning, despite evidence of reduced feeding activity during spawning?<sup>5</sup> Or should they include pre-spawn staging areas that are frequently subjected to intense recreational fishing pressure (e.g., Raritan Bay)? We recognize the rationale for no-harvest spawning closures but believe that these questions should be explicitly addressed through an addendum following the 2022 stock assessment update prior to implementation.

In the interim, we also encourage the Board to identify opportunities for increased research on post-release mortality of/sublethal impacts on large pre-spawning and spawning striped bass. Understanding the biological impacts of catch-and-release fishing on these valuable fish is critical for informing management and outreach measures to minimize risk to the spawning stock when it is at its most vulnerable.

### **Option C. Additional Gear Restrictions**

*Preferred Alternative—Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.*

Rationale: Prohibiting the use of lethal devices such as gaffs to land and release striped bass is a valuable, common-sense step to reduce release mortality that has already been adopted by some conservation-minded states. Numerous non-lethal alternatives (rubber-mesh nets, swiveling lip-grippers) exist on the market that enable both efficient landing and safe release are widely available.

*Preferred Alternative—Sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.*

Rationale: This language fulfills the intent of the circle hook mandate included in Addendum VI and closes a potential loophole around the mandate to use an in-line circle hook with natural bait when recreationally fishing for striped bass.

### **Option D. Outreach and Education**

*Preferred Alternative—Sub-option D2: It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns.*

Regulations can only do so much when it comes to minimizing post-release mortality—much of the onus lies on the individual angler’s gear use, hooking/fighting methods, and handling/release practices. As a result, we continue to support outreach efforts by individual states to promote best practices. At the same time, given limited state resources and the potential ability to leverage existing materials (e.g., from other states) for their own purposes, we don’t support the overly prescriptive nature of Sub-option D1.

We would also like to take the opportunity to express our opposition to the last recommended best practice included under Sub-option D1: “Once an angler has retained their bag limit, consider targeting a different species.” This recommendation appears to disregard the numerous anglers who view catching and releasing striped bass as the goal in their angling experience and implies that the

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<sup>5</sup> Delaware Division of Fish and Wildlife. May 2006. Striped Bass Food Habits Project. <https://pdf4pro.com/cdn/delaware-department-of-natural-resources-and-3c3ff.pdf>.

only value in the fishery comes from harvest. As a result, we recommend removing this suggestion from the list of best practices.

#### **4.4 Rebuilding Plan**

We are encouraged to see the Board addressing the need to implement a rebuilding plan for the striped bass stock, which was declared overfished approximately three years ago. Rapid action that accounts for recent poor recruitment is imperative for rebuilding the stock to the target by 2029.

##### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

*Preferred Alternative: **Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.*

Rationale: It's imperative to adjust fishing mortality to account for the recent decline in spawning success of striped bass. We recognize that this approach could result in stricter measures in the short term, but believe that it positions the Board to meet the Fishery Management Plan's goals in the long term.

##### **4.4.2 Rebuilding Plan Framework**

*Preferred Alternative: **Option B:** 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 recruitment assumption specified in Amendment 7) 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.*

Rationale: If the 2022 stock assessment indicates that the fishery is not on track to rebuild by 2029, as required, the Board must take quick and decisive action to further reduce fishing mortality. The traditional addendum process would delay management action for a year, further jeopardizing the ability to promptly rebuild. Option B would enable the Board to quickly enact new measures for the 2023 fishing season—should it be necessary. While we recognize that this option would not afford the full public comment process that an addendum entails, we also understand that there will be opportunities for the public to provide input to the Board before it makes its decision on specific measures to take.

##### **4.6.2 Management Program Equivalency**

We are not unconditionally opposed to Management Program Equivalency—also known as conservation equivalency (CE)—which we recognize may be warranted for some states/jurisdictions to account for the unique nature of their fisheries. However, we are also well-aware of the additional uncertainty that CE can inject into management, and have witnessed how CE can be abused by individual states in a way that jeopardizes the effectiveness of coastwide conservation efforts. For example, New Jersey's CE provisions under Addendum VI enabled its anglers to harvest striped bass less than 28 inches and greater than 35 inches, undermining the goal of protecting fish outside of the

coastwide 28-35 inch slot limit.<sup>6</sup> Given these concerns, we are hopeful that some of the proposed guardrails around CE that are included in this section will ultimately be incorporated into Amendment 7.

### **Option B. Restrict the Use of Conservation Equivalency Based on Stock Status**

*Preferred Alternative—Sub-option B1-a: CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.*

Rationale: Given the additional risk associated with CE implementation, it should not be an option when the stock is overfished.

### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

*Preferred Alternative—Sub-option C3: CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30.*

Rationale: As stated in the draft amendment, under NOAA Fisheries' new Recreational Fishing Survey and Data Standards, MRIP estimates with a PSE exceeding 30 will include a warning that they "are not considered sufficiently reliable for most purposes, and should be treated with caution."<sup>7</sup> In line with that guidance, we do not believe that estimates associated with a PSE of greater than 30 should be used in CE proposals. This sub-option does not preclude the ability of states to increase their own sampling efforts in order to increase the precision of estimates and thus enable the use of CE.

### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

*Preferred Alternative—Sub-option D2: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.*

Rationale: The addition of a front-end uncertainty buffer is a valuable step for accounting for the additional uncertainty in achieving management objectives that CE entails. A 25% buffer is an appropriate middle ground that does not rule out the use of CE but does account for CE's additional risk to the fishery.

### **Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

*Preferred Alternative—Sub-option E2: Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state-specific level.*

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<sup>6</sup> ASMFC. 2020. Next Steps for Management. Memorandum from Max Appelman to the Atlantic Striped Bass Management Board. [http://www.asmfc.org/uploads/file/5ec2b1b5AtlStripedBassTC\\_Report\\_April2020.pdf](http://www.asmfc.org/uploads/file/5ec2b1b5AtlStripedBassTC_Report_April2020.pdf).

<sup>7</sup> NOAA Fisheries. Recreational Fishing Survey and Data Standards. <https://www.fisheries.noaa.gov/recreational-fishing-data/recreational-fishing-survey-and-data-standards>.

Rationale: It is fair and equitable for individual states to bear the proportionate burden when a reduction in fishing mortality is needed (or, in the case of liberalization, enjoy the proportionate increase). Requiring states to achieve their respective change in fishing mortality will further ensure the likelihood of the Board achieving the coastwide target.

Striped bass are at the core of the east coast's recreational fishing community and economy, and all eyes on the Striped Bass Board as it decides the fate of the ASMFC's flagship species. Please take this opportunity to position this treasured species for recovery and long-term success.

We thank you for your consideration of our comments.

Sincerely,

Supporting Organizations

Supporting Businesses

DRAFT

From: [Ari Carhciyan](#)  
Sent: Thursday, April 7, 2022 10:22 PM  
To: [Comments](#)  
Subject: Draft Amendment 7

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To may it concern... I have been an avid fisherman for more than 30 years living in Long Island.. I remember when my dad, brother and I catch a bucket full of snappers.. Now looking back did we need too? As I got older I got into surfcasting and fell in love with thr sport. I became more aware of the fisheries and its history. I love catching big bluefish and striped bass. Too be honest I'm in favor with the new restrictions but it has to go across thr board, for recreational and commercial. Look at Florida's rules and regulations, they work great.. maybe striped bass season needs to be from June or July to Dec 15th.. maybe another moratorium or 3 year ban on striped bass fishing with heavy penalties... thank you for reading this email, I hope the agency makes the right decision

[Sent from Yahoo Mail on Android](#)

From: [gary donnelly](#)  
Sent: Saturday, April 9, 2022 9:03 AM  
To: [Comments](#)  
Subject: [External] draft amendment 7

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Categories: Auto Replied

To whoever may be reading this,

My name is Gary Donnelly, and I am a striped bass fisherman. I am now 31 years old, and have fished for stripers my whole life. Residing 15 mins east of Albany has afforded me the opportunity to annually fish the migratory striped bass run in the hudson river. Aside from the migratory run in the Hudson, I have also fished for stripers from Montauk, New York up to Portland, Maine and anywhere I could in between. In all my years of fishing, I can count on one hand the number of striped bass I have kept to eat. And I know there are many others just like me. Sportsmen, just looking for the thrill of catching their next personal best striped bass. I also believe with proper fish handling and use of circle hooks we should see a steep decline in the fish mortality rate. So, I guess I have a few questions for you. 1. Why are we implementing regulations only to deem them un successful after one season? Should we allow more time before making such a decision? 2. Why are commercial fishermen with nets on the beaches of Long Island allowed to harvest pick up truck loads of stripers? What about the bycatch there? Are those under-sized/oversized fish released healthy? Are they really abiding by the slot limits? 3. Have you considered the effect a moratorium would have on the businesses that thrive during striper season? Bait shops, marinas, and charters just to name a few. I hope somebody actually reads this, and maybe even answers a few of these questions. At the least, maybe some of these points could be considered before making a decision regarding the recreational striped bass fishery.

Sincerely,  
Gary Donnelly

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The response was:



From: [Striped Bass Amendment 7](#)  
Sent: Sunday, April 10, 2022 8:15 AM  
To: [Granolaspice@yahoo.com](mailto:Granolaspice@yahoo.com)  
Subject: Comment for Draft Amendment 7

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My name is Stephen Rempe and I am an avid surfcaster from the state of New York. Fishing for striped bass, particularly in the surf, in and around long island for me is not just a recreational activity. I am passionate about our fishery, striped bass in particular, and feel very strongly that the striped bass stock is in decline. The striped bass fishery needs to be managed for abundance. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Stephen Rempe

Flanders, New York

Email: [Granolaspice@yahoo.com](mailto:Granolaspice@yahoo.com)

April 14, 2022

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

## **Atlantic Striped Bass Amendment 7 Public Comment Letter**

Dear Ms. Franke and the Atlantic Striped Bass Management Board:

I am a lifelong fisherman and believe that this is a critical time in the management of the striped bass population. A healthy population is critical to the ocean's health, and to the recreation and economic interests of states on the East Coast.

In order for ASMFC to continue its mission of "leaving healthy and abundant marine fisheries for the next generation to enjoy," I support the following options:

### **4.1**

#### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

#### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

#### **Tier 3**

Option A- Support A2

Option B- Support B2

#### **Tier 4**

Support A

### **4.2**

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D2

#### **4.4.1**

Support B

**4.4.2**

Support B

**4.6.2**

Option B- Support B1-a

Option C- Support C3

Option D- Support D2

Option E- Support E2

I appreciate the opportunity to provide comments.

Sincerely,

Bill Fiora

Westport Point, MA

[comments@asmfc.org](mailto:comments@asmfc.org)

State Board Members

Maine

[FVHATTIEROSE@AOL.COM](mailto:FVHATTIEROSE@AOL.COM)

[DAVID.MIRAMANT@LEGISLATURE.MAINE.GOV](mailto:DAVID.MIRAMANT@LEGISLATURE.MAINE.GOV)

[PATRICK.KELIHER@MAINE.GOV](mailto:PATRICK.KELIHER@MAINE.GOV)

[MEGAN.WARE@MAINE.GOV](mailto:MEGAN.WARE@MAINE.GOV)

[JAY.MCCREIGHT@LEGISLATURE.MAINE.GOV](mailto:JAY.MCCREIGHT@LEGISLATURE.MAINE.GOV)

Delaware

[JOHN.CLARK@DELAWARE.GOV](mailto:JOHN.CLARK@DELAWARE.GOV)

[FISHMASTER70@COMCAST.NET](mailto:FISHMASTER70@COMCAST.NET)

[WILLIAM.CARSON@DELAWARE.GOV](mailto:WILLIAM.CARSON@DELAWARE.GOV)

[CRABMAN31@AOL.COM](mailto:CRABMAN31@AOL.COM)

Rhode Island

[ERICREIDRI@GMAIL.COM](mailto:ERICREIDRI@GMAIL.COM)

[LIZZY.2@CHARTER.NET](mailto:LIZZY.2@CHARTER.NET)

[KURT.BLANCHARD@DEM.RI.GOV](mailto:KURT.BLANCHARD@DEM.RI.GOV)

[JASON.MCNAMEE@DEM.RI.GOV](mailto:JASON.MCNAMEE@DEM.RI.GOV)

[SEN-SOSNOWSKI@RILIN.STATE.RI.US](mailto:SEN-SOSNOWSKI@RILIN.STATE.RI.US)

Sam Calagione

AMSFC and State Board Members,

I first want to thank you all for making this process available and accessible to public comment. It is important to our resources that those who use them can contribute to improving and conserving them.

As I've grown up and moved along the East Coast, the striped bass has followed me and brought me outside to see this region's diverse coastal resources. I was born and raised in coastal Delaware, right at the mouth of the bay. First discovering fly fishing, I spent hours drifting through salt marshes that line the bay, picking up smaller bass that live there year-round and the occasional big breeder in the spring. The Delaware Bay itself is a habitat for massive schools of menhaden that striped bass follows on their migration.

As I write this, I am a senior in college at Brown University in Providence, Rhode Island. Here too, the striped bass that flood the Narraganset Bay have provided me a way to get away from campus when I need to get outside. The bay provides great estuary habitat to every size class of striper and South County beaches are lit up with migrating fish in the spring and fall.

I spent the last few summers living in Southport, Maine, exploring the Kennebec Watershed. 40% of Maine's freshwater drains through these rivers, providing a haven for the herring, menhaden, sand eels, lobsters, crabs, eels, and mackerel that stripers eat. Last summer, the striper gave me a job as I guided anglers around the mud flats, ledges, and marshes of Mid-Coast Maine, showing them all the beautiful natural features of the rivers and the amazing waterfront restaurants we have. Knowing the unfortunate recruitment stocks in the southern bays, I am nervous about the abundance of striped bass I guide for this summer.

Seeing all these different waters, the striped bass has shaped a perspective that understands the importance of preserving *each* area along the fish's migration path both for their sake and ours.

In order to obtain that goal I think it imperative to enact the following aspects of Amendment Seven:

#### **4.1**

##### **Tier 1**

**Option A1** - to reduce the amount of striped bass taken each year

**Option B1** - threshold triggers

**Option C1** - to stay in line with the stated options

##### **Tier 2**

**Option A2** - to implement a rebuilding plan for a stock declared overfished

**Option B1** - to allow quick action to address stock assessments

**Option C1** - to quickly react to bad years

##### **Tier 3**

**Option A2** - to update an ineffective trigger

**Option B2**- to change standards according to low recruitment

##### **Tier 4**

**Option A**(Status Quo)- to prevent lengthy delays

#### **4.2**

**Option C1 & C2** - to optimally release striped bass safely

**Option D2** - to allow each states to take responsibility for educating their anglers

#### **4.4**

**Option B2** - to account for recent low recruitment stocks while rebuilding

**Option B1a** - to best assess risk

**Option C3** - to best consider NOAA's estimated percentage

**Option D2** - uncertainty buffer

**Option E2** - to consider reduction in view of the entire migratory range



Daniel Tukey  
24 Captain Besse Rd,  
South Yarmouth, MA 02664  
4/14/2022

**RE: Draft Amendment 7 – Interstate Fishery Management Plan for Atlantic Striped Bass Public Comment to the Atlantic States Marine Fisheries Commission**

Dear Commissioners,

I write to express my deep concern surrounding the current and future state of the striped bass fisheries. As data and anecdotal evidence indicate, immediate action is needed to prevent the continued decline of this beloved fishery. Thankfully, this commission finds itself in a position to directly, and positively, shape the future of striped bass. This is an immense responsibility and selecting the wrong actions or in some cases continuing on the path of inaction will have long-term impacts to our coastal ecosystem, the economy, and our ability to recreate and connect with nature.

Thank you for the opportunity to provide written comments of Draft Amendment 7. Please find below a summary of support for certain options associated with Amendment 7.

**Summary of Support:**

**4.1 Management Triggers:**

**Tier 1: Fishing Mortality Triggers**

- *Option A: Timeline to Reduce F to the Target – In support of sub-option A1*
- *Option B: F Threshold Triggers – In support of sub-option B1*
- *Option C: F Target Triggers – In support of sub-option C1*

**Tier 2: Female Spawning Stock Biomass Management Triggers**

- *Option A: Deadline to Implement a Rebuilding Plan – In support of sub-option A2*
- *Option B: SSB Threshold Trigger – In support of sub-option B1*
- *Option C: SSB Target Trigger – In support of sub-option C1*

**Tier 3: Recruitment Triggers**

- *Option A: Recruitment Trigger Definition – In support of sub-option A2*
- *Option B: Management Response to Recruitment Trigger – In support of sub-option B2*



Tier 4: Deferred Management Action

- **In support of option A**

4.2 Recreation Fishery Management Measures

- Option B: Effort Controls (Seasonal Closures) – **In support of sub-option B2 and sub-option B2-b**
- Option C: Additional Gear Restrictions – **In support of sub-option C1**
- Option D: Outreach and Education – **In support of sub-option D1**

4.4 Rebuilding Plan

- 4.4.1 Recruitment Assumption for Rebuilding Calculation – **In support of option B**
- 4.4.2 Rebuilding Plan Framework – **In support of option B**

4.6 Alternative State Management Regimes

- 4.6.2 Management Program Equivalency Option B – **In support of sub-option B1**
- 4.6.2 Management Program Equivalency Option C – **In support of sub-option C3**
- 4.6.2 Management Program Equivalency Option D – **In support of sub-option D3**
- 4.6.2 Management Program Equivalency Option E – **In support of sub-option E2**

Thank you for your attention to this written comment and may the striped bass population improve as a result of your actions.

Sincerely,  
Daniel Tukey

April 14, 2022

Comments on the Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass.

After attempting to read thru the 141-page document I found it to be difficult to understand all the different options until I came to the section on proposed actions in spawning waters. I fish in the tidal reaches of the Hudson River. The proposal to shut down sections of the tidal Hudson River to targeting of striped bass is unacceptable to me. I can live with a catch and release fishery which I practice now. The Striped bass season in the tidal Hudson River opens on April 1<sup>st</sup> and almost all adult striped bass leave the Hudson River by Memorial Day weekend or earlier depending on the water temperature. That's it until the following spring. Any shut down of 2 weeks or more during this period would be devastating to the striped bass recreational fishery and all the businesses supported by recreational fisherman. Presently the Hudson River tidal section is managed much stricter than other estuaries. The slot limit of one fish between 18" to 28" is restrictive and designed to protect larger reproducing striped bass. But these fish leave the Hudson River and are hammered in the ocean or other estuary fisheries where size limits are less restrictive. Makes no sense to me. Here in the tidal Hudson River several years ago fishermen agreed to remove the option of keeping a striped bass over 40". Most agreed a fish that size was usually a female and was better to release it. That led to an end of striped bass tournaments on the Hudson which in my opinion was a positive. The Hudson River fisherman have been doing their part.

I agree with the circle hook requirement and there should be more outreach and education on the proper handling of striped bass for release. I think conservation equivalency is misused and is practically unmeasurable and should not be an option.

Additional thoughts:

1. Power utilities on the Hudson River in exchange for drawing cooling water operated a successful striped bass hatchery. For 20 years the hatchery raised 600,000 striper fry annually and released into the Hudson River. This practice should be restarted not only on the Hudson but also in each estuary with spawning striped bass. Many species of fish are successfully raised in hatcheries. Why not striped bass? I think the investment would be worth the return.
2. Require artificial lures only. No bait. I fish for striped bass exclusively with artificial lures. 99% of the fish I catch are lip hooked and are easily and quickly de-hooked and released usually without removing from the water.
3. Classify striped bass as a game fish.
4. If the mortality rate is as high as reported, wouldn't I see more floating dead fish? I don't see it in the Hudson River.
5. 85% of the striped bass I catch are males. Females tend to be less interested in feeding during the spawn.
6. I've seen the Hudson erupt in a striped bass spawn as far as the eye can see. Appears to be a successful endeavor.

With Respect,

Owen J Sullivan  
8 Hudson River Lane  
Garrison, NY 10524

ASMFC Commission  
Attn: Emilie Franke

Dear Ms Frake,

My name is Thomas Matulonis. I am an avid fisherman and have been for the past 40 years. I have fished through the highs and lows as well as the last striped bass moratorium. I am happy to say that I lived long enough now to have fished through what was the heyday of striped bass. Sadly, the current state of the fishery leads me to believe we may be headed back towards another moratorium.

The ASMFC has the power to create changes in a timely fashion that will ultimately strengthen the striped bass biomass. Whether or not the council acts on what should be done remains to be seen. If history has taught us anything, the time for change is now.

I have summarized my public comment, in support of each Option stated in the draft Amendment below. Thank you for your time.

Sincerely,

Thomas Matulonis

Public comment on the Tier options for Amendment 7:

**Tier 1 Option A** – Support Sub-Option 1 (status quo). The effort should not be delayed any more than 1 year.

**Tier 1 Option B** – Support Sub-Option B1 (status quo). Again, let's make the adjustment time period as short as possible.

**Tier 1 Option C** – Support Sub-Option C1 (Status quo) – mortality should be assessed effectively, and a determination made in a shorter timeframe. Waiting for 3 years could effectively lead to collapse as data is collected.

**Tier 2 Option A** – Support Sub-Option A2 – A 2-year deadline will help to hold ASMFC parties, recreational anglers, and commercial fisheries accountable.

**Tier 2 Option B** – Support Sub-option B1 – obviously cannot support a no management trigger sub option.

**Tier 2 Option C** – Support Sub-Option C1 (status quo) – tighter timelines are more favorable. The population is obviously suffering already, why delay.

**Tier 3 Option A** – Support Sub-Option A3 – High sensitivity is needed to cause more frequent management of a suffering biomass.

**Tier 3 Option B** – Support Sub Option B2 – This seems to assume mortality based on an already low recruitment which would be conservative and triggers a tighter timeline for management programs.

**Tier 4** – Support Option A (status quo) – There should be no deferment, especially when the population is suffering and there is a data lag. This needs to hold responsible parties accountable.

## 4.2 Rec Management Measures and Options:

**Support Option B specifically Option B2-b** No Target Spawning closure required – the spawning fish need to be protected. How can you have a management trigger (SSB) if you don't protect them in the first place.

### 4.4.1 Recruitment Assumption

**Option B support** – more conservative and will contribute to stricter management measures

### 4.4.2 Rebuilding Plan

Support Option B – rejecting the status quo will allow for voting and a reassessment of both commercial and recreational impact. This is a way to get the Commercial quotas evaluated and the bag limits, size/slots, among other things that somehow the Commercial sector was able to avoid in the general language of Amendment 7

### 4.6.2 Management Program Equivalency (CE)

**Support Option B** to restrict CE but encourage the removal of present CE programs sooner. States should not operate independently which encourages judgement outside of a likely biological and habitat based science and is heavily influenced by money and politics. I believe that CE should be forever removed.

April 2, 2022

**To:** Emilie Franke  
Fishery Management Plan Coordinator  
Atlan; c States Marine Fisheries Commission  
1050 North Highland Street  
Suite 200A-N Arlington, Virginia 22201  
comments@asmfc.org (subject line: Striped Bass PID)

**From:** Stephen J. McDonald  
3398 Homestead Avenue  
Wantagh, ny 11793

**Subject: Public Comment Striped Bass PID/Amendment 7**

I have been fishing for striped bass, recreationally, for a very long time. During the years I have witnessed a great abundance of striped bass fished into the dark days of the "moratorium". The stock rebounded since then but has again been fished into significant decline. It is fairly obvious to me that the biggest problem with fishery management has been protracted delay in taking action.

I have spent quite some time (hours) going over the Public Information Document for Amendment 7. It is a ponderous document but it does offer promise to restore the bass population. However, among a myriad of options within the Public Information Document there are far too many which just further delay taking action.

Delay is the problem. We need a plan that will accurately assess the abundance and quickly take corrective action.

My position on the Management Plan options are as follows:

**Tier 1 – Timeline to Reduce F to Target**

**Sub Option A1 and B1** Status quo from Amendment 6 and require a reduction of F to target level or below **within one year**.

**Sub Option B1**, Keep the Threshold Trigger at 1-year for F exceedance

**Sub Option C1**, Allows for quicker management actions to be taken when faced with F exceedance.

**Tier 2 – SSB Triggers**

**Sub Option A2**, Requires the Commission to issue a **rebuilding plan within two years** if a SSB trigger is tripped.

**Sub Option B1**, A status quo option that keeps the SSB Trigger set at "if the SSB drops below the threshold, the management plan **must be adjusted** within an established time-frame".

**Sub Option C1**, The trigger for SSB Target would be 2 years of falling below the target to **require management action**.

### **Tier 3 – Recruitment Triggers**

**Sub Option A2**, The trigger needs to be placed at a meaningful level. Enable the managers to take corrective actions, in the event that the fishery suffers poor recruitment, while the fishery is in an overfished state.

**Sub Option B2**, Allow for a properly conservative response to low-recruitment data.

### **Tier 4 – Deferred Management Action**

**Option A**. No more delay

### **Recreational Management Measures**

**Option B2-a**, No harvest of bass in spawning areas from January through April.

**Sub Option C-1**, No gaffs on Striped Bass.

**Option D2**, Outreach and education on proper fishing and handling of fish practices.

### **Rebuilding Plan**

**Option B** By using an assumed low recruitment regime, we can offset issues where F is not accurately being identified.

### **Rebuilding Plan Framework**

**Option B** Allows for quicker action by the commission in the event that the 2022 stock assessment results show that this is needed.

### **Management Program Equivalency**

**Option B1-a**, “Conservative Equivalence” has been a dismal failure and should not be considered until the stock has been rebuilt.

If Conservative Equivalence is considered:

**Option C**. MRIP data should not be usable in coming up with Conservative Equivalencies, in cases where the Standard Error is above 30%.

**Option D2**. It is practical and prudent to require a 25% uncertainty buffer in proposals for CE.

Sincerely,

Stephen J. McDonald





123 Long Pasture Way  
Tiverton, RI 02878  
April 14, 2022

VIA EMAIL

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

**RE: Comments on Atlantic Striped Bass Amendment 7**

Dear Ms. Franke and Atlantic Striped Bass Management Board:

I am a recreational striped bass angler and writing to provide comments on Amendment 7. For the last 30 years, I have regularly fished for striped bass in the Chesapeake Bay, Potomac River waters in the District of Columbia, Maine, Massachusetts, Rhode Island, Connecticut, and North Carolina. I live in Arlington, VA and Tiverton, RI. Recreational fishing for striped bass is part of my family tradition and it has spanned generations. My wife's father, my wife and our three sons all fish for striped bass.

I am concerned that striped bass populations are in a downward trajectory of decline, heading to levels of the 1970s and 80s. Over the last ten years in fishing for striped bass, I have seen a significant decline in the fishery through my experience as a frequent angler. Based on data from the ASMFC, spawning striped bass populations are likely to drop to the catastrophic levels of the early eighties within the next five years.

Unless we make immediate significant changes to improve spawning striped bass populations, we could be headed for another moratorium on striped bass like what we had in the 1970/80s. While science and clean water have improved since then, climate change and other pressures on the ecosystem present significant challenges for healthy populations of striped bass.

Attached are my policy preferences for Amendment 7. These positions are consistent with positions outlined by the Rhode Island Saltwater Angler's Association, the American Saltwater Guides Association, and Theodore Roosevelt Conservation Partners. I am supporters of all these organizations.

Thank you for the opportunity to submit these comments.

Sincerely,

Kenneth Mendez

#### 4.1 Management Triggers

##### **Tier 1: Fishing Mortality (F) Triggers**

Option A: Timeline to Reduce F to the Target

*I support **Sub-option A1** (status quo): Reduce F to a level that is at or below the target within one year.*

Option B: F Threshold Triggers

*I support **Sub-option B1** (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.*

Option C: F Target Triggers

*I support **Sub-option C1** (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.*

##### **Tier 2: Spawning Stock Biomass (SSB) Triggers**

Option A: Deadline to Implement a Rebuilding Plan

*I support **Sub-option A2**: Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment.*

Option B: SSB Threshold Trigger

*I support **Sub-option B1** (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].*

Option C: SSB Target Trigger

*I support **Sub-option C1** (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].*

##### **Tier 3: Recruitment Triggers**

Option A: Recruitment Trigger Definition

*I support: **Sub-Option A2**: The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years. The high recruitment reference period used for this trigger may be adjusted as recommended by the TC during benchmark stock assessments. This trigger alternative has a moderate sensitivity; it is more sensitive than the status quo but less sensitive than sub-option A3.*

**Option B: Management Response to Recruitment Trigger**

*I support **Sub-option B2**: If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.*

**Tier 4: Deferred Management Action**

*I support **Option A (status quo)**: No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.*

**4.2.2 Measures to Address Recreational Release Mortality**

**Option B. Effort Controls (Seasonal Closures)**

*I generally support reasonable restrictions that will help reduce mortality of striped bass.*

*I support Option B2-b: All recreational targeting of striped bass would be prohibited for a minimum two-week period on all spawning grounds. We feel that the poor recruitment over the last 3 years requires greater protection during spawning. We would not be opposed to re-evaluation of this requirement after 3 years, especially if recruitment is improved.*

**Option C. Additional Gear Restrictions**

*I support **Sub-option C1**: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.*

*I support **Sub-option C2**: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.*

**Option D. Outreach and Education**

*I support—**Sub-option D2**: It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.*

**4.4 Rebuilding Plan**

**4.4.1 Recruitment Assumption for Rebuilding Calculation**

*I support **Option B**: Rebuild female SSB to the SSB target level by no later than 2029. Frebuild is calculated to achieve the SSB target by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.*

**4.4.2 Rebuilding Plan Framework**

*I support **Option B**: 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 recruitment assumption specified in Amendment 7) 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 Frebuild via Board action.*

**4.6.2 Management Program Equivalency**

**Option B. Restrict the Use of Conservation Equivalency Based on Stock Status**

*I support **Sub-option B1-a**: CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.*

**Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

*I support **Sub-option C3**: CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30%.*

**Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

*I support **Sub-option D1**: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 10%. We are not opposed to a higher buffer of 25% (option D2) but we believe that if the other measures listed above are implemented with respect to CE, then an additional buffer of 10% will be sufficient.*

**Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

*I support **Sub-option E2**: Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state-specific level.*



April 15, 2022

Emilie Franke

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

Dear Ms. Franke,

I've been a strong advocate for better conservation of striped bass for nearly 30 years, so I respectfully encourage the Atlantic States Marine Fisheries Commission (ASMFC) to embrace a 21st Century vision regarding Draft Amendment 7 to the Atlantic Striped Bass Interstate Fishery Management Plan.

That means not simply restoring the striper fishery to the required minimum levels, but to adopt a comprehensive plan that favors abundance and sustainability. We should reimagine what's possible, and avoid complacency so as not to repeat mistakes of the past. Stripers should be managed for maximum abundance, not maximum harvest. That requires aggressive and sustained action by the ASMFC and States, and sacrifices from those of us in the sportfishing community as well as the commercial sector.

As a member of the ASMFC's Striped Bass Advisory Panel, I am keenly aware of how complicated Draft Amendment 7 actually is. Done right, Draft Amendment 7 offers America's 7.5 million striper anglers and the sportfishing industry the best chance to not just rebuild the striper fishery but to protect these invaluable gamefish well into the future.

Moreover, as a small business owner who is deeply involved in and concerned with the vitality of the striper fishery and the sport fishing industry, I wholeheartedly support the specific recommendations made by the Coastal Conservation Association, American Sportfishing Association, Center for Sportfishing Policy, Congressional Sportsmen's Foundation, and Theodore Roosevelt Conservation Partnership.

Thank you for the opportunity to comment.

Respectfully,

Capt. Chris D. Dollar  
Outdoor Communications & Fishing Outfitter  
cdollarchesapeake@gmail.com  
(410) 991-8468

I would like to submit these comments on Draft Amendment 7 to the FMP for Striped Bass on my own behalf.

### **Under Tier 1 - Fishing Mortality (F) Management Triggers**

**Option A, Timeline to Reduce F to the Target** - I support the status quo option, A1, the reduction of F to target within 1 year.

**Option B, F Threshold Triggers**– I support the status quo, option B1, reduce F to a level that is at or below the target within the timeframe selected under Option A.

**Option C, F Target Triggers** – I support the status quo, option C1, : If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

### **Under Tier 2 - Female Spawning Stock Biomass (SSB) Management Triggers**

**Option A, Deadline to Implement a Rebuilding Plan** – I support option A2, A 2 year deadline to implement a rebuilding plan

**Option B: SSB Threshold Trigger** – I support the status quo, option B1, If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

**Option C: SSB Target Trigger** – I support the status quo, option C1, If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

### **Under Tier 3 - Recruitment Triggers**

**Option A: Recruitment Trigger Definition** – I support option A2, The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA) 11 shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

**Option B: Management Response to Recruitment Trigger** – I support option B2, If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

### **Under Tier 4 - Deferred Management Action**

I support the status quo, option A, No Deferred Management Action.  
*I would also lend support to options C, Management action may be deferred until the next assessment if the F target management trigger is tripped and SSB is above the target, and option D, Management action may be deferred until the next assessment if the F target management trigger is tripped and SSB is projected to increase or remain at the current level over the next five years. These other options would also be acceptable choice.*

## **Under section 4.2.2, Measures to Address Recreational Release Mortality**

### **Option B, Effort Controls** (seasonal closures)

**Option B1, state specific closures** - I do NOT support in-season closures for any species as I believe the socio-economic impacts do not support them and cause too much harm to those industries that rely on recreational fishing. Reducing season length by delaying the season opening or advancing the season closure are both acceptable options.

**Option B2, Spawning Area Closures** - I fully support option B2-b, No-Targeting Spawning Closure Required. Spawning season closures such as those currently used within the Chesapeake Bay System are a viable option that should be put in place in the Hudson River as well as all spawning areas. Letting these animals reproduce unmolested should be something that should be enforced to help provide for better recruitment.

### **Option C. Additional Gear Restrictions**

I support both option C1, Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass, and C2, Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

### **Option D, Outreach and Education**

I support option D2, a recommendation for states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports.

## **Under section 4.4.1 Recruitment Assumption for Rebuilding Calculation**

I support option B, Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

## **Under section 4.4.2 Rebuilding Plan Framework**

I support option B, 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 recruitment assumption specified in Amendment 7) 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

## **Under section 4.6.2 Management Program Equivalency**

Under **Option B - I support option B2-a, Applicability** - The stock status restrictions selected in Option B1 would apply to the following additional fisheries the Hudson River, Delaware River, and Delaware Bay recreational fisheries

### **Under Option C, Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

I support option C1, 50%

Under **Option D, Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries** - I support option D3 – 50%. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries

Under **Option E, Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries** - I support option E2, the percent reduction/liberalization projected for the FMP standard at the state-specific level. I would like to point out that moving away from this option would allow states, like New Jersey, to again create CE options that would not lead to meeting the coastwide reductions of

other Amendments or addendums that would require specific reductions in mortality/harvest because the proposed CE regulations would only adhere to the coastal reduction and not the actual state's required reduction to rebuild the stock or to reduce mortality, F.

Thank you for your attention,

Bob Danielson  
86 Balin Ave  
South Setauket, NY 11720



Dear Commissioners,

I appreciate the opportunity to comment on Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass. Generally, as an angler that has targeted these fish off of New York and Massachusetts since the early 90's, seeing the "good times" and the recent "not so good" times, I strongly encourage you to take action that will improve the striped bass stock as quickly as possible. I am deeply concerned about the health of the stock and the associated very apparent dwindling quality of the striped bass fishery. This is not the time to consider any sort of "flexibility" or "moving of the goal posts" that only leads to inaction. This sort of short-term thinking delays necessary management measures needed immediately to help these fish out and get back to the abundance and quality fishery that we all got to experience not-so-long ago. Please see the specific recommendations below for the options that I support.

Best,

John Hadley

Specifically I support the following:

#### **4.1 Management Triggers**

##### **TIER 1: FISHING MORTALITY (F) TRIGGERS**

###### **Option A: Timeline to Reduce F to the Target**

**Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year.

###### **Option B: F Threshold Triggers**

**Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

###### **Option C: F Target Triggers**

**Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

##### **TIER 2: SPAWNING STOCK BIOMASS (SSB) TRIGGERS**

###### **Option A: Deadline to Implement a Rebuilding Plan**

**Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

###### **Option B: SSB Threshold Trigger**

**Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

#### **Option C: SSB Target Trigger**

**Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

### **TIER 3: RECRUITMENT TRIGGERS**

#### **Option A: Recruitment Trigger Definition**

**Sub-option A2:** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

#### **Option B: Management Response to Recruitment Trigger**

**Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

### **TIER 4: DEFERRED MANAGEMENT ACTION**

#### **Option A (status quo): No Deferred Management Action.**

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

#### **4.2.2 Measures to Address Recreational Release Mortality**

##### **Option C. Additional Gear Restrictions**

**Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

##### **Option D. Outreach and Education**

**Sub-option D2:** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

## **4.4 Rebuilding Plan**

### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

**Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

### **4.4.2 Rebuilding Plan Framework**

**Option B:** 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 recruitment assumption specified in Amendment 7) 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.

### **4.6.2 Management Program Equivalency (Conservation Equivalency)**

#### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

**Sub-option B1-a:** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

#### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

**Sub-option C3:** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

#### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

**Sub-option D2:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

#### **Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

**Sub-option E2:** the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Dear ASMFC,

My name is Shawn Boisclair, and I am from the state of Massachusetts. Striped bass are important to me because of so many reasons, they are a premier game fish of new England, the pursuit of striped bass are a key source of recreation to me, fishing for striped bass contributes a large source of money across the entire fishing industry from rod and reel manufactures, lure makers, sporting goods retailers both large and small, local guides, bait shops, etc.

They are the essence of summer surf fishing here in New England and fishing for them began from my early childhood and I want to see a strong fishery for my children and grandchildren to enjoy.

Lastly, they are both a beautiful fish and an important part of the ecosystem of the ocean, bay's and estuaries. While I release most of the fish it is a prize on the table. We need to protect this resource, nurture a strong fishery that can support the varied needs of all including that of the ocean life we are entrusted to manage.

Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.4.1

TIER 1:

Support A1

Support B1

Support C1 TIER 2:

Support A2

Support B1

Support C1 TIER 3:

Support A2

Support B2 TIER 4:

Support A4.2

None

Support C1, C2

Support D24.4.1

Support B4.4.2

Support B4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment and share my thoughts and concerns and I hope that my voice will be heard.

Sincerely,

Shawn Boisclair

91 Donbray Road

Springfield, MA 01119 email: shawnboisclair@gmail.com

To Whom it may concern

I am writing in response to the ASMFC request for comments on the draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass.

My name is Bob Huddy and I currently reside in Connecticut and fish for Striped Bass in New Jersey, New York, Connecticut, Rhode Island and Massachusetts.

I started fishing for Striped Bass in New Jersey in the early 1970's, so I have seen some very good years and some very, very bad years. The bad years being the years leading up to when moratorium were in place, and the years when moratorium were in place.

As I am closing in on retirement and have two sons in their 30's that will fish with me on occasion, I am very concerned about the current state of the Striped Bass fishery and even more so about the apparent trend of the fishery. I believe significant action is required in the very near term in order to avoid another period of "bad years" upon us.

I suppose that I should add that I am a professional engineer with some significant training and certification in statistical methods in addition to first-hand experience with fishing for Striped Bass over the years.

My personal belief is that the best near-term solution would be a moratorium on recreational fishing that would allow fishing as catch and release only (preferably with modified hooks to prevent mortality as best as is feasible). Given that, I am voicing my support for the following options in Amendment 7 in the hopes that these options are the best chance of implementing such a measure.

### **Tier 1: Fishing Mortality (F) Triggers**

#### **Option A: Timeline to Reduce F to the Target**

**I support Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year.

#### **Option B: F Threshold Triggers**

**I support Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

#### **Option C: F Target Triggers**

**I support Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

### **Tier 2: Spawning Stock Biomass (SSB) Triggers**

## **Option A: Deadline to Implement a Rebuilding Plan**

**I support Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

## **Option B: SSB Threshold Trigger**

**I support Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

## **Option C: SSB Target Trigger**

**I support Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

## **Tier 3: Recruitment Triggers**

### **Option A: Recruitment Trigger Definition**

**I support Sub-option A2:** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

### **Option B: Management Response to Recruitment Trigger**

**I support Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

## **Tier 4: Deferred Management Action**

### **I support Sub-option A (status quo): No Deferred Management Action.**

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

## **4.2.2 Measures to Address Recreational Release Mortality**

### **Option C. Additional Gear Restrictions**

**I support Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**I support Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

### **Option D. Outreach and Education**

**I support Sub-option D2:** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

## **4.4 Rebuilding Plan**

### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

**I support Sub-option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

### **4.4.2 Rebuilding Plan Framework**

**I support Sub-option B:** 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 recruitment assumption specified in Amendment 7) 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.

## **4.6.2 Management Program Equivalency (Conservation Equivalency)**

### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

**I support Sub-option B1-a:** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

**I support Sub-option C3:** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

**Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

**I support Sub-option D2:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

**Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

**I support Sub-option E2:** the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Robert P. Huddy

Avon, Connecticut

Email: [rphud4@gmail.com](mailto:rphud4@gmail.com)

Dated 15APR2022



To Whom It May Concern:

My name is Mike Barry and I have been fishing for striped bass in Maine for the last 30 years. My dad would bring me out on his boat where we would chunk bait at night and catch fish bigger than I was at the time. Using only artificial baits from land, I have evolved into a diehard surfcaster that will only fish on the most level playing field. These fish have created a lifestyle for me that I am unable to replicate from other forms of fishing or any hobby altogether. I have such a passion for these fish that I really don't know what I do without them. It's easy for many other anglers to point blame and exploit the faults of the fisheries management but that doesn't help the situation at hand, nor does it account for the fishery. The complexities that exist in fisheries management is hard to grasp by even the most intelligent and experienced individuals. Instead of being advised by an organization, I've spent many hours reading and re-reading amendment 7 so I would have my own understanding and opinions of it. Currently, we need to do what's in the best interest of the fish, not the best interest of the individuals who catch the fish and certainly not the ones who profit from the fish. Listed below in green are the options I support for amendment 7, I hope my public comment can help shed light on what recreational anglers like me would like to see.

## **4.1 TIER 1 OPTIONS: Fishing Mortality (F) Management Triggers**

### **Option A: Timeline to Reduce F to the Target**

**I am in support of Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year.

### **Option B: F Threshold Triggers**

**I am in support of Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

### **Option C: F Target Triggers**

**I am in support of Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

## **TIER 2 OPTIONS: Female Spawning Stock Biomass (SSB) Management Triggers**

## **Option A: Deadline to Implement a Rebuilding Plan**

**I am in support of Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan**  
The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment

## **Option B: SSB Threshold Trigger**

**I am in support of Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

## **Option C: SSB Target Trigger**

**I am in support of Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

## **TIER 3 OPTIONS: Recruitment Triggers**

### **Option A: Recruitment Trigger Definition**

**I am in support of Sub-option A3:** The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model (NY, NJ, MD, VA) shows an index value that is below the median of all values in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years

### **Option B: Management Response to Recruitment Trigger**

**I am in support of Sub-option B2:** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

## **TIER 4 OPTIONS: Deferred Management Action**

**I am in support of Option A (status quo): No Deferred Management Action.**

## **4.2 RECREATIONAL FISHERY MANAGEMENT MEASURES**

### **4.2.2 Measures to Address Recreational Release Mortality**

#### **Option B: Effort Controls (Seasonal Closures)**

**I am in support of Sub-option B2: Spawning Area Closures**

**I am in support of Sub-option B2-b: No-Targeting Spawning Closure Required**

#### **Option C: Additional Gear Restrictions**

**I am in support of sub-options C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**And**

**C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury

#### **Option D: Outreach and Education**

**I am in support of Sub-option D1:** States would be required to promote best striped bass handling and release practices by developing public education and outreach campaigns. States must provide updates on public education and outreach efforts in annual state compliance reports

## **4.4 REBUILDING PLAN**

### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

**I am in support of Option B:** Rebuild female SSB to the SSB target level by no later than 2029

#### **4.4.2** Rebuilding Plan Framework

**I am in support of Option B:** 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 recruitment assumption specified in Amendment 7) 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.

### **4.6** ALTERNATIVE STATE MANAGEMENT REGIMES

#### **4.6.2** Management Program Equivalency

**Option B:** Restrict the Use of Conservation Equivalency Based on Stock Status

**I am in support of Sub-option B1:** Restrictions

**I am in support of Sub-option B1-a:** the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

**Option C:** Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals

**I am in support of Sub-option C3:** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

**Option D:** Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries

**I am in support of Sub-option D3:** 50% Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 50%.

**Option E: Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

**I am in support of Sub-option E2: the percent reduction/liberalization projected for the FMP standard at the state-specific level.**

Thank you for your time

Mike

April 15, 2022

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

Ms. Franke,

My comments with regard to the options available for shaping *Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass* follow this note. I am using this opportunity to submit additional comments for the record.

I am beyond disappointed at the ASMFC Striped Bass Technical Committee for its conduct during this protracted process. As a member of the board of directors of Stripers Forever and an active advocate on behalf of our members and for striped bass, I have not been shy about sharing our belief that ASMFC SBTC bears a great deal of the blame for years of mismanagement and inaction with regard to conservation of Atlantic striped bass.

Despite those frustrations, when this process began, I and my fellow members of the board gave the SBTC the benefit of the doubt and considered how we could be part of a process that would end with a new strategic plan that would have the best chance of success. What we got in return was nothing short of disrespectful of our organizations, our members, and of the spirit of public comment.

When we took a position advocating for a ten-year harvest moratorium, we expected opposition from the commercial sector and even some in the recreational sector. What we didn't expect was opposition from the ASMFC's own Board, but that is what happened.

- One ASMFC board member, Dennis Abbott of New Hampshire, identified himself as a delegate and spoke openly *against* the idea of a moratorium when a member of the public addressed the issue during a public hearing.
- Another ASMFC board member, Michael Luisi of Maryland, referred to Stripers Forever as “extremists” during an interview with a reporter working on a story about Amendment 7 and striped bass conservation.
- Then, when the first draft of A7 management options was published before the October 2021 meeting—in what can only be interpreted as a vindictive act—there was the curious appearance of a recreational-only moratorium.

We have seen how the SBTC refuses to accept any responsibility for more than twenty years of steady striped bass stock decline. We have seen the complete lack of self-awareness from among your members who, in the face of two-decades of failure, boast publicly of their years of service that coincide with that decline. We have seen how the Board continues to blame the recreational community for the decline, despite the fact that it is that very constituency that has begged the ASMFC for stronger conservation (and we are not ignorant of the fact that a convicted Lacey Act violator inexplicably serves as a proxy delegate from the state of Maryland).

Now, as we look ahead to seeing this plan come together, be adopted, and become the basis for a ten-year recovery, I and tens of thousands of other recreational striped bass anglers are left with little hope that the plan will succeed. Our pessimism for the future of striped bass is matched only by the level of contempt your organization seem to hold for us.

While I hope Amendment 7 achieves its goals, that is an unlikely outcome. And if the fishery again collapses, will you then finally accept your responsibility for failure, or will you continue to look elsewhere for blame?

Michael Spinney  
Townsend, MA

My comments on specific options follow:

#### **4.1 Management Triggers**

##### **TIER 1 OPTIONS: Fishing Mortality (F) Triggers**

Option A: Timeline to Reduce F to the Target:

I support sub-option A1.

Option B: F Threshold Triggers:

I support sub-option B1.

Option C: F Target Triggers:

I support sub-option C1.

##### **TIER 2 OPTIONS: Female Spawning Stock Biomass (SSB) Management Triggers**

Option A: Deadline to Implement Rebuilding Plan:

I support sub-option A2.

Option B: SSB Threshold Trigger:

I support sub-option B1.

Option C: SSB Target Trigger:

I support sub-option.

##### **TIER 3 OPTIONS: Recruitment Triggers**

Option A: Recruitment Trigger Definition:

I support sub-option A3.

Option B: Management Response to Recruitment Trigger:

I support sub-option B2.

**TIER 4 OPTIONS: Deferred Management Action:** I support option A.

**4.2 Recreational Fishery Management Measures**

**Option B. Effort Controls (Seasonal Closures)** I support sub-option B2.

**Option C. Additional Gear Restrictions** I support sub-option C1.

**Option D. Outreach and Education** I support sub-option D1.

**4.4 REBUILDING PLAN**

**4.4.1 Recruitment Assumption for Rebuilding Calculation:** I support option B

**4.4.2 Rebuilding Plan Framework:** I support option B.

**4.6 ALTERNATIVE STATE MANAGEMENT REGIMES**

**4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option B. Restrict the Use of Conservation Equivalency Based on Stock Status**

I support sub-option B1.

**4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

I support sub-option C3.

**4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

I support Sub-option D3

**4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

I support sub-option E2.



## Comment on ASMFC Amendment 7

I'm here to share my voice regarding several aspects of Amendment 7, which are hopefully receiving an overwhelming amount of support. This population of fish is so extremely important to us, and our everyman's favorite line-siders are once again asking for our support.

Rebuilding the population is possible, as we have seen before. Implementing a strict deadline to resolve this issue as in Option B of 4.4.1, and allowing for modularity of tactics, as in Option B of 4.4.2, will be the best courses of action.

Regarding section 4.1: reaction time for repairing the damage done to fish populations is paramount. As stated in Tier 1 Sub-option A1, reaction times to reduce excess mortality should be limited to no longer than one year, and if excess mortality exists for consecutive years, then programs must be introduced to reduce mortality, as in Tier 1 Sub-options B1 and C1. Action must be taken immediately with the shortest possible time to enact protection maneuvers for spawning females, juveniles, and any part of the population, such as Tier 2 Sub-options A2, B1, and C1, and Tier 3 Sub-options A2 and B2. No deferred management action is acceptable whenever any of these triggers are tripped, as in Tier 4 Option A.

Properly addressing the conservation equivalency can help us bolster the future populations' chances. In 4.6.2, Sub-options B1-a, C3, D2, and E2 all offer reasonable solutions for monitoring and qualifying the position of the populations.

As many know, or should know, some of the most damage comes from the recreational fishing community. Any measures that can reduce the number of improperly caught and handled fish, such as 4.2.2 Sub-options C1 and C2, should be taken and strongly enforced. One of the best things about striped bass is their accessibility, which is also a double-edged sword. Allowing for a better educational system, in reference to Sub-option D2, for recreational anglers will help people understand that dredging a bass 100ft through the sand like a chicken cutlet about to be fried severely inhibits survivability. We all love stripers, and it's time to show them how much we mean it.

Thank you so much for your time,

Joe Alicino

A handwritten signature in black ink, appearing to read 'JA', with a stylized flourish at the end.

Billy Crotty  
99 Border St. Apt. 306  
Boston, MA 02128  
b.crotty82@gmail.com

Emilie Franke  
Fishery Management Plan Coordinator, ASMFC  
1050 N. Highland St.  
Suite 200 A-N  
Arlington, Virginia 22201

Dear Emilie,

I am a recreational fisherman and have been fishing for Atlantic striped bass since I was old enough to hold a fishing rod. Most recently, I have been actively engaged in both the boat and shore-fishing saltwater communities in the greater Boston area. The Atlantic striped bass fishery is an integral part of my life, and I believe plays an integral role in the coastal community and economy of not just Massachusetts but all the Atlantic states. Please accept my comments on the Atlantic Striped Bass Draft Amendment 7, listed below:

#### 4.1 Management Triggers

- Tier 1: Fishing Mortality (F) Triggers
  - Option A: Timeline to Reduce F to the Target
    - **I support Sub-option A1 (status quo): Reduce F to a level that is at or below the target within one year.**
      - The Striped Bass Management Board has a history of inaction. They should not be given additional time to act on protecting the Atlantic striped bass fishery.
  - Option B: F Threshold Triggers
    - **I support Sub-option B1 (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.**
  - Option C: F Target Triggers
    - **I support Sub-option C1 (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.**
- Tier 2: Spawning Stock Biomass (SSB) Triggers
  - Option A: Deadline to Implement a Rebuilding Plan
    - **I support Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.**

- Striped bass were declared overfished in 2018 – four years ago – and a rebuilding plan has not been established. It is important that this lag doesn't occur again in the future.
    - Option B: SSB Threshold Trigger
      - **I support Sub-option B1 (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].**
        - If the Atlantic striped bass stock becomes overfished, it needs to be addressed ASAP. Delay only makes recovery harder.
    - Option C: SSB Target Trigger
      - **I support Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].**
        - The SSB is a critical measure of the health of the fishery. When the SSB is trending downward, it is our responsibility to adjust our practices as much as possible to recover it.
  - Tier 3: Recruitment Triggers
    - Option A: Recruitment Trigger Definition
      - **I support Sub-option A2: The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.**
        - Recent history dictates that this trigger must be changed. Even with poor recruitment, this trigger was never activated for coastal stock and only once for the North Carolina stock in the last 20 years.
    - Option B: Management Response to Recruitment Trigger
      - **I support Sub-option B2. If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.**
        - Our history of taking advantage of strong stock year classes and ignoring poor stock year classes is not conducive to maintaining a healthy fishery. The trigger must be adjusted to force the board to respond to the recruitment research.

- Tier 4: Deferred Management Action
  - **I support Option A (status quo): No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.**
    - There should be no delay in management of the fishery, regardless of previous triggers. The Board should not be given an excuse for inaction when the science dictates that action to protect the fishery is necessary.

#### 4.2.2 Measures to Address Recreational Release Mortality

- Option C. Additional Gear Restrictions
  - **I support Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.**
    - Approximately 90% of the Atlantic striped bass fishery is catch and release. To reduce recreational release mortality, only nonlethal methods should be allowed
  - **I support Sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.**
    - Again, this reduces recreational release mortality, which I believe will have an affect on overall stocks. This closes the loophole allowing anglers to keep a bycatch when fishing with a J-hook or other unapproved method for catching striped bass.
- Option D. Outreach and Education
  - **I support Sub-option D2: It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.**

#### 4.4 Rebuilding Plan

##### 4.4.1 Recruitment Assumption for Rebuilding Calculation

- **I support Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.**
  - Option B accounts for recent low recruitment in the Atlantic striped bass stock. This cannot be ignored in the rebuilding plan.

##### 4.4.2 Rebuilding Plan Framework

- **I support Option B: 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 recruitment assumption specified in Amendment 7) 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.**
  - Stock assessments for 2022 will not be released until October 2022. The research in this assessment could warrant different action than what is implemented by

Amendment 7. The Board should be able to address the need for any changes necessitated by the most recent assessment of the Atlantic striped bass stock.

#### 4.6.2 Management Program Equivalency (Conservation Equivalency)

- Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status
  - **I support Sub-option B1-a: CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.**
    - Conservation equivalency (CE) has led to the abuse of the striped bass stock by certain states and is a large part of the reason why the stock is where it is today (LOW). If the striped bass stock is below the management threshold, CE should not exist.
- Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals
  - **I support Sub-option C3: CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.**
    - This will improve data on the recreational fishery, benefiting both fishermen/women and the fishery itself.
- Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries
  - **I support Sub-option D2: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.**
    - This option acknowledges that CE is a problem for the collective management of a fishery that is affected by the actions of all Atlantic states. This option brings accountability to the states using CE.
- Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries
  - **I support Sub-option E2: the percent reduction/liberalization projected for the FMP standard at the state-specific level.**
    - The per-state harvest reduction to manage the fishery should be proportional to the individual state's own harvest. State A should not be responsible for recovering a portion of State B's over-fishing.

While I believe all sections of the Atlantic Striped Bass Draft Amendment 7 are important to properly managing the health of the fishery, I would like to place emphasis on section 4.6.2 Management Program Equivalency (Conservation Equivalency). I believe that when the individual states on the Atlantic Coast are given the opportunity to enact their own regulations that do not match that of the ASMFC, they will take advantage of it to the detriment of the striped bass fishery.

Thank you for your time and consideration of my comments.

Sincerely,  
Billy Crotty

## Comments on Draft Amendment 7 to the IFMP for Striped Bass

Desmond M. Kahn, Ph.D

President, Fishery Investigations

I am a former long-term member of the Striped Bass Stock Assessment (1995-2009) and Tagging Subcommittees (1994-2009; Chair 1998-2000 and 2004-2006) and the Striped Bass Technical Committee (2002-2009; Chair 2008-2009), representing the Delaware Division of Fish and Wildlife.

These comments address two areas, the biological reference points and the estimation of fishing mortality. These two sets of issues are critical because they are the basis for the recent determination that striped bass were found to be overfished with overfishing occurring. Both myself and several other experienced retired members of these committees disagree with that claim.

My comments on the biomass reference points can be summarized by stating that there is no scientific basis for these estimates and they are too high, especially the target. My comments on the fishing mortality estimates are that they ignore completely the tag estimates, which have been independently corroborated and are much lower than the estimates of fishing mortality produced by the tag model and that the F estimates from the catch-at-age model are biased due especially to the well-documented bias in the ageing method based on scales. Additionally, the CAA model estimates are biased due to the retrospective pattern, which shows that the F estimates for a given year virtually always decline with additional data and the SSB estimates for a given year almost always increase with additional data.

Consequently, the estimates of F and SSB are overstated and understated, respectively. This has been stated for years, but the Technical Committee ignores these flaws, which cause it to provide biased and misleading advice to the Management Board. I do not exempt myself from this criticism, since these biases were evident during my tenure on the technical committee, although our work on the tag-committee produced much lower F estimates than the catch-at-age model when I worked on both.

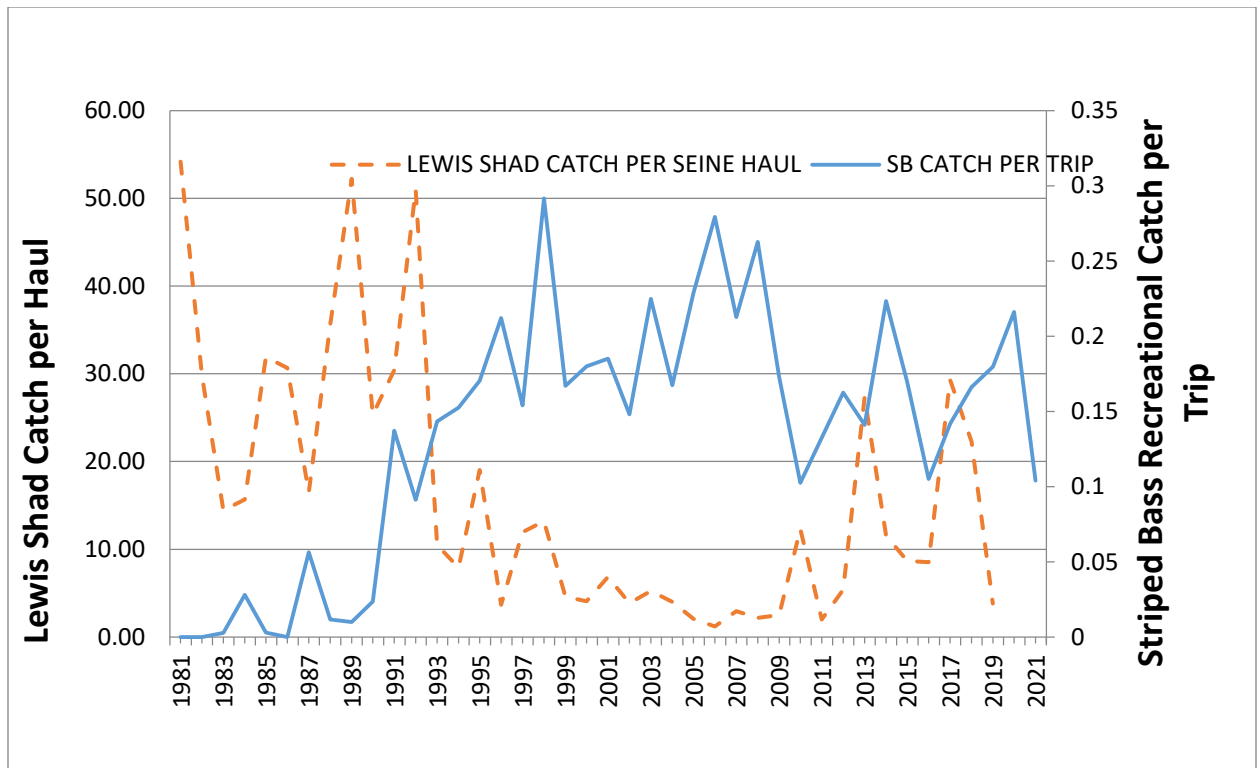
The SSB overfishing threshold, which is the basis for the claim that the stock was overfished in 2017, was set by some process that was really based on people deciding that they liked that abundance level and they were arbitrarily choosing it to determine whether overfishing was occurring or not. In reality, overfishing thresholds are usually used to determine whether abundance is so low that recruitment overfishing is occurring. Recruitment overfishing exists when a stock has been reduced to a level where it cannot produce adequate recruits to replace the stock. There are proposed scientific methodologies to estimate a threshold for recruitment overfishing (The late Ransom Myers et al. have investigated these).

The current SSB target, which was arbitrarily set to be 25% higher than the threshold, may be relatively close to the theoretical carrying capacity of this stock, which is the point at

which density-dependent natural mortality is so high that the stock cannot grow. If so, it is unreasonably high. Even at its recent peak during the 2000s, the stock never reached this target, so it can't rebuild to it, as the draft amendment states.

Estimates of carrying capacity and the biomass that would theoretically produce maximum sustained yield (Bmsy) can be produced by surplus production modelling, which could produce estimates of reference points that will give an understanding of reasonable expectations of stock growth potential and give guidance in setting scientifically based biological reference points. We lack understanding of reasonable biological reference points for striped bass currently. Preliminary surplus production modelling indicated that the current SSB threshold is higher than Bmsy. Current federal management policy often uses Bmsy as a target and half of Bmsy as an overfishing threshold. That approach would probably produce a far, far lower overfishing threshold than the current one. Taken together, this information raises the strong possibility that the threshold and target are inflated for striped bass, causing the Board to find overfishing occurring and cut back landings unnecessarily.

ASMFC claims it is a science-based organization, but I find no evidence of that in the choice of these biological reference points, which are critical in controlling management actions. One potential effect of inflated reference points is a very high level of predation by striped bass which can reduce abundance of other fish and impact other fisheries. An example is the finding by the Weakfish Technical Committee in 2006 that the large increase in striped bass caused the dramatic decline of weakfish in the Mid-Atlantic. Another is the following negative correlation between the abundance of American shad in the Delaware River and the abundance of striped bass in the waters of the state of Delaware, which is consistent with top-down predation control of shad by bass ( $r = -0.62$ ,  $P < 0.01$ ). Independent field work has documented that large striped bass (roughly 35") eat adult American shad.



The estimation of fishing mortality is the second area that needs improvement. As a member of the Technical Committee, I participated in a lengthy study of the accuracy of our scale method of ageing bass. We used known-age striped bass scales and allowed states to age them. The conclusion was that we were systematically underaging older fish, maybe age 11 and older. Nothing was done about this. What it means is that the SCA model is being fed biased information. By underaging older fish, the input data caused the model to underestimate survival rate, meaning it overestimates mortality. That causes the model to overestimate fishing mortality, because it estimates  $F$  by first estimating total mortality,  $Z$ , then subtracting the estimate of natural mortality,  $M$ , to get  $F$ :  $F = Z - M$ . If  $Z$  is biased high, then  $F$  will be biased high. In 2012, Liao, Sharov, Jones and Nelson (two of the authors are members of the Striped Bass Stock Assessment Subcommittee) published a peer-reviewed paper that used otolith age-length data to age striped bass instead of the biased scale-aged data. When they input the new resulting data into the SCA model, estimates of fishing mortality were lower and estimates of SSB were higher. This striking indication of bias was also ignored. Consequently, it is clear that the SCA estimates of  $F$  and SSB are biased high and low, respectively, due to biased age-length data.

An additional source of bias in the assessment process is the retrospective pattern. What this means is that if we add additional years of data to the SCA model and run it, the estimates of  $F$  and SSB for a given year from the previous model are now lower and higher, respectively. Since the new run is based on additional years of data, it should be more accurate.



This bias re-occurs every time the assessment is done, but it, also, is ignored. Note that this bias is added to the bias from the age bias. In the case of the retrospective and the age bias, they seem to be ignored because they are inconvenient.

A final comment on F estimation is that the tag-recapture estimates, which are described in the draft amendment, are far lower than those from the SCA. These tag estimates of F have been corroborated by a different tagging method used in the Potomac River in a recent peer-reviewed paper by Secor et al (2020). While the draft describes the tag-recap estimates as complementary to the SCA, it should have described them as ignored. The Stock Assessment Subcommittee, when it was asked about the difference in the two sets of estimates by a Board member, focused on problems with the estimation of the tag-reporting rate, but the estimates of total mortality, Z, are not affected in any way by the tag reporting rate estimate. In addition, there are a whole sample of tag reporting rate estimates from 2013 that can be summarized by an average with a 95% confidence interval to estimate F and M from the tag results. It is currently unclear why the tag-based estimates are completely ignored, except that they are inconvenient for the SCA results.

In conclusion, I have focused on issues with the stock assessment because these issues control the Board's actions. I hope these comments can stimulate some constructive work on the issues I have described.

April 12, 2022

Emilie Franke

Fishery Management Plan Coordinator

Atlantic States Marine Fisheries Commission

1050 North Highland Street, Suite 200A-N

Arlington, Virginia 22201

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board:

I am writing today to contribute my comments for Amendment 7 in regards to the recovery of the overfished status of the striped bass stock. Overfishing has gone on for too long and multiple age classes of the striped bass fishery are being further overfished as a result of poor decision making by the ASMFC Board. Some ASMFC Board members are making selfish choices to benefit their personal interests over the entire angling public's interests in striped bass management. This is both deeply disturbing and alarming to me that Board members act this way. The Amendment 7 document seemed deliberately confusing and had management options that were quite frankly, a joke.

To be clear, I have listed the choices I support as a recreational angler fishing +100 days a year that I believe would benefit this fishery I am so dearly passionate about seeing recovered below:

- **4.1 Management Triggers**
  - Tier 1: Fishing Mortality (F) Triggers
    - Option A: Timeline to Reduce F to the Target, *I support sub-option A1*
    - Option B: F Threshold Triggers, *I support sub-option B1*
    - Option C: F Target Triggers, *I support sub-option C1*
  - Tier 2: Spawning Stock Biomass (SSB) Triggers
    - Option A: Deadline to Implement a Rebuilding Plan, *I support sub-option A2*
    - Option B: SSB Threshold Trigger, *I support sub-option B1*
    - Option C: SSB Target Trigger, *I support sub-option C1*
  - Tier 3: Recruitment Triggers
    - Option A: Recruitment Trigger Definition, *I support sub-option A2*
    - Option B: Management Response to Recruitment Trigger, *I support sub-option B2*
  - Tier 4: Deferred Management Action
    - *I support option A for No Deferred Management Action*
- **4.2.2 Measures to Address Recreational Release Mortality**
  - Option C. Additional Gear Restrictions
    - *I support sub-option C1 & C2*
  - Option D. Outreach and Education

- *I support sub-option D2*
- **4.4 Rebuilding Plan**
  - 4.4.1 Recruitment Assumption for Rebuilding Calculation
    - *I support option B*
  - 4.4.2 Rebuilding Plan Framework
    - *I support option B*
- **4.6.2 Management Program Equivalency (Conservation Equivalency)**
  - Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status
    - *I support sub-option B1-a*
  - Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals
    - *I support sub-option C3*
  - Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries
    - *I support sub-option D2*
  - Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries
    - *I support sub-option E2*

In closing, the striped bass is a unique part of the heritage of the North East and far too valuable as a gamefish to be managed as a sellable resource like black sea bass or porgy. Besides, sea food counters all over now sell farmed striped bass or hybrids, we frankly do not need wild striped bass like we used to. I would like to see the ASMFC focus on setting conservative triggers to protect the stock better in the future over the thresholds that sit dangerously close on the line of sustainable or harmful at all times. Results produced from modeled data need to have less margins of error in case of miscalculations that could be harming the fishery further rather than protecting it. Managing for abundance and a robust population instead of a number of pounds harvested per year is healthier for the stock and more in line with the attitudes of the largest stakeholder group, recreational anglers who a majority practice catch and release. I am not against harvest, commercial or recreational, but we cannot let the striped bass stock fail again or worse, go the way of cod and never recover...

Thank you for taking the time to read this letter and consider my comments in your review of Amendment 7. I hope to see the Board take appropriate actions to restore this fishery I love.

*Eric Malone*

Eric Malone

FishHead765@gmail.com

April 13, 2022

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

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board (Board):

Thank you for the opportunity to comment on Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass ("Plan"). I am a New York resident, a recreational catch and release fly fisher, and perhaps quite different from other commenters, I am a 25+ year environmental lawyer with recognized expertise in fisheries conservation matters. I pursued a Pelly Petition to protect tuna and dolphin populations, addressed horseshoe crab habitat protections, litigated the BP Oil Spill after that catastrophic and mismanaged program nearly decimated an entire economy and way of life with trophic cascades throughout the coastal ecosystem, challenged numerous offshore and nearshore oil and gas projects that would adversely impact fisheries and marine mammals, kept gray wolves on the endangered species list in the Northeast, participated in developing the recovery plan for bald eagles as they transitioned from endangered to threatened, regularly advocate for measures to improve water quality and recently supported the research and writing of a Healthy Oceans Coalition/American Littoral Society publication on the importance of state protected fish areas. I also served as both an attorney for and Board member of American Littoral Society, which support fisheries research with fish tagging data since 1967. I have been a member of a number of conservation organizations that use science to guide policy and action and I am a proponent of the precautionary principle.

While I generally support and am aligned with conservation-minded fishing guides, small charter boat captains, small fishing-related businesses, and anglers who rely on a robust striped bass population for income and recreation, and appreciate the work they have done, my background and experience with other species compels, and my lack of a direct financial interest in fishing, lead me to recommend the Board adopt a more precautionary approach. I would suggest that regulatory uncertainty is an easy mark and a convenient rationale. There is and always will be inherent uncertainty in natural resources management, unless we impose a moratorium (which may be where we land). If the goal is to rebuild and then sustain stock health and abundance, then regulatory uncertainty should not be used as a basis to advocate for the anything other than the most protective approach.

I urge the Board to take decisive action to rebuild the fishery and establish management reforms that position the Atlantic striped bass stock for long-term abundance and stability. This decisive action is required to address dangerously low spawning stock biomass and young-of-

year numbers in upper Chesapeake Bay. My position on each of the decision points for the four major issues contained in the Draft Amendment are set forth below.

#### 4.1 Management Triggers

- Tier 1: Fishing Mortality (F) Triggers
  - Option A: Timeline to Reduce F to the Target
    - Sub-option A1 (status quo): Reduce F to a level that is at or below the target within one year.

Rationale: The Board should continue to be required to take rapid action to curb overfishing. This need is magnified when taking into account the built-in lag in the Board's response time to end overfishing once the trigger is tripped. This trigger should require immediate action and such action should be approved for implementation on an emergent basis due to the exigent circumstances when the data supports the finding. The risks to the stocks are known, delay is unnecessary as the public and stakeholders are on notice as to the level establishing the trigger.

- Option B: F Threshold Triggers
  - Sub-option B1 (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

Rationale: While I recognize that there is some uncertainty around only one year of recreational data collected through the Marine Recreational Information Program (MRIP), recovery and management of the fishery requires a precautionary approach.

- Option C: F Target Triggers
  - Sub-option C1 (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

Rationale: This option better aligns with the status quo options selected for Options A and B and denotes a relationship between F and SSB.

- Tier 2: Female Spawning Stock Biomass (SSB) Triggers
  - Option A: Deadline to Implement a Rebuilding Plan
    - Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment.

Rationale: While the Board took action to curb overfishing through Addendum VI, it has yet to explicitly confront the challenge of rebuilding the stock despite the fishery management plan's requirement to do so within 10 years (i.e., by 2029) despite learning that the stock was overfished in April 2019. A two-year deadline would compel the Board to act swiftly to rebuild

the stock while also aligning with the rebuilding requirements for federally managed fisheries under the purview of the Magnuson-Stevens Act.

- Option B: SSB Threshold Trigger
  - Sub-option B1 (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

Rationale: There is no rational basis to remove the SSB threshold trigger at this time. The health of the striped bass stock is measured by SSB, and managers must take action if it declines to unhealthy levels. B2 offers no trigger related to the female SSB threshold. Responsiveness to both F triggers and female SSB is called for given the status of the fishery.

- Option C: SSB Target Trigger
  - Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

Rationale: Controlling F is always important, but especially so if it is associated with a decline in SSB, and C1 offers the shortest timeframe.

- Tier 3: Recruitment Triggers
  - Option A: Recruitment Trigger Definition
    - Sub-Option A3: Any of the core JAls is below the median of values from 1992-2006 for 3 consecutive years.

Rationale: Both Sub-option A2 and Sub-option A3 provide much-needed increases in sensitivity of the recruitment trigger in order to detect not just outright failure, but also periods of mediocre recruitment that necessitate a reduction in F. The purpose of all triggers is a warning system to prompt action by the Board. Given the dire status of the fishery and the much-commented upon and agreed importance of the fishery both culturally and economically, it is necessary to take action using the signals the fishery is giving. Variability is inherent in a migratory species dependent on the ecosystem.

- Option B: Management Response to Recruitment Trigger
  - Sub-option B2: an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

Rationale: Under the current Plan, the Board is not compelled to adjust F to account for both good and bad year classes (recruitment). With several recent years of poor year classes, it is critical that the Plan is more responsive to these shifts. B2 puts an interim F target adjustment in place if the recruitment trigger is tripped.

- Tier 4: Deferred Management Action
  - Option A (status quo): No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

Rationale: In order to maximize the chances of achieving a robust striped bass stock, the Board must continue to respond to management triggers as they are tripped.

#### 4.2.Measures to Address Recreational Release Mortality

Recreational release mortality has long been a significant contributor to the decimation of the striped bass fishery, which is not a surprise in a fishery that is primarily recreational and primarily catch-and-release.

By the best estimate, recreational release mortality accounts for approximately half of striped bass fishing mortality. Fishing is a privilege, and the precautionary principle should govern.

- Option B. Effort Controls (Seasonal Closures). I support the inclusion of seasonal closures in Amendment 7.
  - Sub-option B2 – spawning area closures. Multiple states currently have spawning closures in place with closure boundaries defined by those states. These should be mandatory in all states. Existing spawning closures would be applied toward meeting the requirements of the selected option(s). Spawning area closures during the spawning season could contribute to stock rebuilding by eliminating harvest and/or reducing releases of spawning and pre-spawn fish. Reducing catch and release during this time is particularly important to reduce stress and injury to fish as they move into lower salinity spawning areas. If new information on the timing of striped bass spawning is available in the future, the TC would conduct a review of that research and recommend changes to the timing of spawning closures if needed. If this option is selected, CE would not be permitted.
  - Sub-option B2-b. No-Targeting Spawning Closure Required: All recreational targeting of striped bass would be prohibited for a minimum two-week period on all spawning grounds (not necessarily the entire spawning area) during Wave 2 (March-April) or Wave 3 (May-June), as determined by states to align with peak spawning. States will determine the boundaries of spawning ground closures. Closures prohibiting recreational targeting on spawning grounds have already been implemented in Maine (Kennebec River), New Jersey (Delaware River), and Maryland (Chesapeake Bay) during part of Wave 2 and/or Wave 3.

Rationale: The uncertainty regarding these options stems from the definition of the spawning areas and the possibility that states may need to work together to provide the most amount of protection for the SSB as they stage ahead of the spawn and then move up into the river to do so. The best example of this is the case of the Hudson River where fish stage in Raritan Bay, New Jersey before ascending the Hudson River to spawn in NY. In a best case scenario this targeting closure would not only protect the spawning grounds but also the areas in which the SSB congregates prior to spawning. Despite these uncertainties I support these options with the hope that the TC and board will work together to develop these areas.

The benefit of no-targeting closures won't change the behavior of ill-advised, mis-informed or generally unsportsmanlike anglers who will do what they want no matter what the law, regulations, the Plan and this Board state. But it will impact the thousands of anglers who hold this species in high regard, and will collectively work to change the culture and mindset of those who mishandle and harass fish. The striped bass Technical Committee will establish a method for estimating the reduction in mortality resulting from no targeting closures, using methods and evidence-based science gathered from other species.

Notably, however, several producer areas have robust commercial seasons (gillnet and haul seine fisheries) during the early part of the spawning run. If the intent of these proposed measures is to ensure a safe passage during the spawn, it is counterintuitive that these would be recreational-only measures.

- Option C. Additional Gear Restrictions
  - Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

Rationale: Prohibiting the use of lethal devices such as gaffs to land and release striped bass is a valuable, common-sense step to reduce release mortality that has already been adopted by some conservation-minded states. Numerous non-lethal alternatives (rubber-mesh nets, swiveling lip- grippers) exist on the market that enable both efficient landing and safe release are widely available.

- Sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

Rationale: This language fulfills the intent of the circle hook mandate included in Addendum VI and closes a potential loophole around the mandate to use an in-line circle hook with natural bait when recreationally fishing for striped bass.

- Option D. Outreach and Education
  - Sub-option D1: It is recommended states be required to promote best striped bass handling and release practices by developing public education and outreach campaigns.

Regulations can only do so much when it comes to minimizing post-release mortality—much of the onus lies on the individual angler's gear use, hooking/fighting methods, and handling/release practices. I support outreach efforts by individual states to promote best



practices. There are myriad interested stakeholders, state extension officers and volunteers who can provide this support without taxing state's budgets. Further, if the economic value of the fishery is as great as stated, then this is rational, legitimate and reasonable expenditure in support of this conversation and recovery effort.

#### 4.4 Rebuilding Plan

I applaud the inclusion of a rebuilding plan. Rapid action that accounts for recent poor recruitment is imperative for rebuilding the stock to the target by 2029.

- 4.4.1 Recruitment Assumption for Rebuilding Calculation
  - Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

Rationale: It's imperative to adjust fishing mortality to account for the recent decline in spawning success of striped bass.

- 4.4.2 Rebuilding Plan Framework
  - Option B: 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 recruitment assumption specified in Amendment 7) 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.

Rationale: If the 2022 stock assessment indicates that the fishery is not on track to rebuild by 2029, as required, the Board must take quick and decisive action to further reduce fishing mortality. The traditional addendum process would delay management action for a year, further jeopardizing the ability to promptly rebuild. Option B would enable the Board to quickly enact new measures for the 2023 fishing season—should it be necessary. The public will have opportunities to provide input to the Board before it makes its decision on specific measures to take.

- 4.6.2 Management Program Equivalency

CE is abused by individual states in a way that jeopardizes the effectiveness of coastwide conservation efforts. We have seen this in other media and modalities since the advent of environmental regulation in the late 1960s—a race to the bottom when economic advantages are on the line. For example, New Jersey's CE provisions under Addendum VI enabled its anglers to harvest striped bass less than 28 inches and greater than 35 inches, undermining the goal of protecting fish outside of the coastwide 28-35 inch slot limit. Given these concerns, I am hopeful that some of the proposed guardrails around CE that are included in this section will ultimately be incorporated into Amendment 7.

- Option B. Restrict the Use of Conservation Equivalency Based on Stock Status
  - Sub-option B1-a: CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would

not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

Rationale: Given the additional risk associated with CE implementation, it should not be an option when the stock is overfished.

- Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals
  - Sub-option C3: CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30.

Rationale: As stated in the draft amendment, under NOAA Fisheries' new Recreational Fishing Survey and Data Standards, MRIP estimates with a PSE exceeding 30 will include a warning that they "are not considered sufficiently reliable for most purposes, and should be treated with caution." In line with that guidance, estimates associated with a PSE of greater than 30 should be used in CE proposals. This sub-option does not preclude the ability of states to increase their own sampling efforts in order to increase the precision of estimates and thus enable the use of CE. Similarly, data from other sources that can be validated as to method should also be considered.

- Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries
  - Sub-option D3: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 50%.

Rationale: The addition of a front-end uncertainty buffer is a valuable step for accounting for the additional uncertainty in achieving management objectives that CE entails. A 50% buffer will help phase out the damage CEs do in this fishery.

- Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries
  - Sub-option E2: Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state- specific level.

Rationale: This promotes the race to the top, not the current race to the bottom. It is fair and equitable for individual states to bear the proportionate burden when a reduction in fishing mortality is needed (or, in the case of liberalization, enjoy the proportionate increase). Requiring states to achieve their respective change in fishing mortality will further ensure the likelihood of the Board achieving the coastwide target.

Striped bass are majestic, iconic, at the core of the east coast's recreational fishing community and economy. It is a key predator in the Chesapeake Bay and plays an important role in the trophic ecology. Thank you for your leadership and for your consideration of my comments.

Sincerely,  
Julia A. LeMense, JD, LLM, MPH  
NY NY 10009



Dear Commissioners,

I appreciate the opportunity to submit comments around Amendment 7 for Striped Bass management.

As a life-long striped bass angler and father to two (soon to be 3) young boys who are obsessed with fishing and, in particular, striped bass, the management of these fish and their availability to myself and future generations is paramount. When my twin boys were born, I launched a fishing tournament in the Western Long Island Sound focused entirely on raising money and awareness around conservation of our fisheries, with a natural focus on striped bass. The incredible support we have received, and the universal agreement that these fish are worth more in the water than out are both evidence of how the fishing community view striped bass and how the fish should be managed.

Management over the past twenty years has not worked, as we have watched the population decline to where we are today, with low recruitment and little in terms of strong year classes coming up through the system to help turn the tide. Accordingly, it is critical that the Commission capitalizes on the opportunity to help turn the momentum back to the fish, and allow them to rebound and maintain abundance, creating more opportunity and better fishing for everyone.

I have the options of Amendment 7 that I support below, and appreciate your consideration.

### **Fishing Mortality Triggers**

- Sub-option A1 - reduce F to a level that is at or below the target within ONE year.
- Sub-option B1 - If mortality exceeds the threshold, management must be adjusted to reduce mortality to a level that is at or below the target within the one year outlined in sub-option A1.
- Sub-option C1 - if mortality exceeds the target for two consecutive years and the female SSB falls below the target in either of those years, management must be adjusted to reduce mortality to a level at or below the target within the one year outlined in sub-option A1.

### **SSB Triggers**

- Sub-option A2 - Once an SSB-based management trigger is tripped, the ASMFC Board must implement a rebuilding plan within two years.
- Sub-option B1 - If the female SSB falls below the threshold, management must be adjusted to rebuild the biomass to the target level within an established timeframe that should not exceed 10 years.
- Sub-option C1 – if the female SSB falls below the target for two years and mortality rate exceeds target in either of those years, management must be adjusted to rebuild the biomass at or above the target with an established timeframe that should not exceed 10 years.

## **Recruitment Triggers**

- Sub-option A2 – If any of the four JAIs show an index value below 75% of all values in relation to the respective JAI from '92-'06, then the recruitment trigger would be tripped.
- Sub-option B2 – Once recruitment trigger is tripped, an interim mortality target should be implemented that takes the low recruitment into account. If the mortality from the last year of the most recent stock assessment is above the interim mortality target, management must adjust to reduce mortality to the interim target within one year.

## **Deferred Management Plan**

- Option A – If any management trigger is tripped following a benchmark stock assessment (or assessment update), the Board is required to respond regardless of when the last management action was implemented.

## **Additional Gear Restrictions**

- Sub-option C1 – Recreational anglers should be required to use a nonlethal device to remove a striped bass from the water or assist in the release of any striped bass.
- Sub-option C2 – If a striped bass is caught by any unapproved method must be released immediately without any unnecessary injury.

## **Outreach & Education**

- Sub-option D2 – States should develop public education and outreach campaigns to promote best practices around catch and release and handling practices. Annual state compliance reports should include updates on these efforts.

## **Recruitment Assumption for Rebuilding Calculation**

- The female SSB should be rebuilt to the target level no later than 2029.

## **Rebuilding Plan Framework**

- If the upcoming 2022 stock assessment indicates that Amendment 7 measures have less than a 50% chance of rebuilding the stock by the 2029 deadline, and if the stock assessment indicates that at least a 5% reduction in removals is needed to achieve the target mortality rate, the Board may adjust measures to achieve mortality rebuild rate via immediate Board action.

## **Restrict Use of Conservation Equivalency Based on Stock Status**

- Sub-option B1-a - This one is critical. The use of CE has contributed to the failures in management, and changes must be made. CE programs should not be considered or approved when the stock is overfished. They should not be considered until a stock assessment shows that the stock is above that threshold level.

### **Precision Standards for MRIP Estimates Used in CE Proposals**

- Sub-option C3 – CE proposals should not be able to use MRIP estimates associated with a percent standard error exceeding 30%. Any use of CE needs to be closely monitored AND show that it is equivalent to the reduction associated with management proposal.

### **Uncertainty Buffer for Non-Quota Managed Fisheries**

- Sub-option D2 – Any CE proposal for no-quota managed fishery would require an uncertainty buffer of 25%.

### **Definition of Equivalency for CE Proposals with Non-quota Managed Fisheries**

- Sub-option E2 – CE proposals need to demonstrate equivalency to the percent reduction projected for the Fishery Management Plan standard at the state-specific level. When state-wide reduction is required, certain states, due to the level of harvest on a state-by-state basis, will be required to take a larger reduction than others. Any CE proposal from a state needs to match the assumed / required reduction in that state.

Thank you again for the consideration of these comments on Amendment 7. I truly hope that the ASMFC listens to the overwhelming support for stronger management and regulations from the fishing community and takes advantage of this opportunity to turn the page in striped bass management and drive abundance of the stock up and down the coast. Anglers everywhere deserve the opportunities that will drive, and the next generation of anglers deserve it even more.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Taylor Ingraham', written in a cursive style.

R. Taylor Ingraham (and Mack and Sawyer Ingraham too – photos attached).











# AMENDMENT 7 PUBLIC COMMENT

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April 26, 22  
Mario Santos

Addressed To:

Emilie Frankie

Fishery Management Plan Coordinator

Atlantic States Marine Fisheries Commission

1050 North Highland Street, Suite 200A-N

Arlington, Virginia

Dear Ms. Frankie and Atlantic Striped Bass Management Board:

I am a Rhode Island native who's life was drastically altered by the fisheries that surround our 400 miles of coast line. A younger me was influenced by drug and alcohol consumption that plague many of our inner city youth today. Frankly I was headed toward a ditch, hanging with the wrong crowd and getting myself into trouble. Until I met my first large fish, changing the entire course of my life. I remember pouring myself into this sport and found myself in a group of like minded anglers. People who inspired me to do more in life and do the best I can do in all that I do.

I believe a healthy fishery can give that opportunity too many others like me, itching to get away from daily life, whatever that may be for whomever. Not to mention the economic benefit brought on by the very fisheries you manage. National oceanic and Atmospheric Administration reported fisheries support of over 4000 jobs and approximately \$412 million to the Rhode Island economy. Of those jobs I was able to land myself a job working at the saltwater edge; a very well established fishing tackle shop built on education and conservation. I owe my job to these fish, and my boss of course.

The lack of accountability within our fisheries is atrocious. Fisheries abusing conservation equivalence have left our striped bass populations in a free fall. We know there is a path to abundance for everyone, commercial and recreational alike. It is time to put a stop to all the foolishness and save the last of the buffalo. Its time to "leave healthy and abundant marine fisheries for the next generation to enjoy"

I support the following options:

**4.1**

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**Tier 1**

Option A - Support A1

Option B - Support B1

Option C - Support C1

**Tier 2**

Option A - Support A2

Option B - Support B1

Option C - Support C1

**Tier 3**

Option A - Support A2

Option B - Support B2

**Tier 4**

Support A

**4.2**

Option B - Support no measure

Option C - Support C1, C2

Option D - Support D2

**4.4.1**

Support B

**4.4.2**

Support B

**4.6.2**

Option B - Support B1-a

Option C - Support C3

Option D - Support D2

Option E - Support E2

I appreciate the opportunity to advocate for the fisheries I love.

Mario Santos

Staff

The Saltwater Edge

**Patrick H. Cassidy**

31 Alder Lane Harwich, MA 02645 508-246-3757 [patrick@capecodonthefly.com](mailto:patrick@capecodonthefly.com)

April 15, 2022

Emilie Franke  
Fishery Management Plan Coordinator  
Atlantic States Marine Fisheries Commission  
1050 N. Highland St., Suite 200 A-N  
Arlington, Virginia 22201  
[comments@asmfc.org](mailto:comments@asmfc.org)

Re: Public Comment on Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass

Dear commissioners and commission staff,

Thank you for accepting my comments on the draft of Amendment 7. Your hard work on this document and the final result will set the stage for the success of this species and those of us who depend on it for years to come.

I am a for-hire guide on Cape Cod, focused primarily on fly fishing and light tackle trips for striped bass. While I have and will continue to diversify the species my clients catch, striper fishing is the heart of the experience and the core of my business. Last year I ran more than 150 for-hire trips, both from shore and on the boat, drawing visitors to the Cape who also spent their money on local lodging, restaurants and other activities. My own expenses - including on gas, equipment and the various fees and taxes required to run a business - played its own small part in the local economy and beyond. This spending adds up. In 2017, nearly \$35 million in gross domestic product was generated in the region by the fishing industry, according to a report from the Cape Cod Commission.

I have recently hitched my wagon even more tightly to the success of local fisheries, buying a long-time business with a tradition of providing U.S. Coast Guard- approved courses and testing for mariners seeking credentials to run for-hire trips and pursue other careers in the maritime industry. As an instructor of those courses and now owner of the business, my belief that conservation of striped bass is paramount to the success of untold numbers of other small businesses has only increased through my interactions with others who have chosen to bind their lives to these fish. The long term health of this fishery should be the goal, not short term gains that serve short term personal or political motivations. This may mean sacrifice today but the alternative is a long term decline for both the fish and the fisher.

The underlying reason for my support of the following measures are the above-stated beliefs and the further conviction that managing these fish to abundance benefits everyone in the long run. Any delays in action to ensure this are short-sighted and detrimental to the commission's

**Patrick H. Cassidy**

31 Alder Lane Harwich, MA 02645 508-246-3757 [patrick@capecodonthefly.com](mailto:patrick@capecodonthefly.com)

stated mission of promoting “the better utilization” of fisheries along the Atlantic seaboard. In particular (and setting aside for the moment whether “better utilization” is a euphemism for maximum exploitation at the expense of long term conservation) Objective 1 of fisheries management as outlined on the commission’s website begins with the word “rebuild,” which implies it is a top priority and therefore imperative to pursue as speedily as possible. With this in mind I will keep my remaining comments specific to Amendment 7 and brief.

**Tier 1, Option A:** Regarding the options for a timeline on reducing fishing mortality, I support **sub-option A1** that requires reducing fishing mortality to or below the target in one year. It is simply logical to strive for reducing mortality in the shortest reasonable time in light of Amendment 7s stated purpose “to end overfishing and initiate rebuilding in response to the overfished status.” While questions may remain about the use of Marine Recreational Information Program data on this shorter timeline, these are best addressed by improving the collection of data and accountability, including within the recreational fishing community.

**Tier 1, Option B:** Similarly in connection with threshold triggers, the board should select **sub-option B1** adjusting the plan to reduce mortality on the timeline in sub-option A1 once the threshold is exceeded. Waiting for a two-year average at a time when the stock is considered overfished and overfishing is occurring could delay the recovery of the stock unnecessarily. As sub-option B1 is the more conservative approach, the worst outcome would be a short-term sacrifice for a longer term gain.

**Tier 1, Option C:** The board should select **sub-option C1**, requiring that the plan be adjusted to reduce fishing mortality levels to at or below the target in the timeframe in Option A if fishing mortality exceeds that target for two consecutive years and the female spawning stock biomass falls below the related target in either of those two years. This only makes sense in light of the sub-options supported above; in addition, fishing mortality and spawning stock biomass are connected and this should be integral to the plan.

**Tier 2, Option A:** Please choose **sub-option A2**. The time for implementation of a rebuilding plan based on the 2018 finding of striped bass being overfished and overfishing occurring is long overdue. A two-year requirement for implementing such a plan would get the ball moving more quickly and save the fishery from similar delays in the future.

**Tier 2, Option B:** I support **sub-option B1**, which would require adjustments to the plan to rebuild the female spawning stock biomass within a period no longer than 10 years if it falls below the target. This is in line with responding as quickly as possible to overfishing of the stock. Accordingly, I do not support sub-option C3, as outlined below.

**Tier 2, Option C:** As with Tier 1, sub-option C1, the board should choose **sub-option C1** in this case as well, requiring that the plan be adjusted to rebuild the female spawning stock biomass to at or above the target within no less than 10 years if the biomass calls below the target for two consecutive years and fishing mortality exceeds the target for either of those years. The same rationale applies as applied in my support for Tier 1, sub-option C1.

**Tier 3, Option A:** I support **sub-option A2** for the recruitment trigger. It seems like a good middle ground that would prompt a management response without causing such responses to become unwieldy.

**Tier 3, Option B:** Please choose **sub-option B2**. Once a recruitment trigger is tripped this option would provide an appropriate management response. Recruitment is crucial to a healthy stock and reducing fishing mortality in response to low recruitment will help address problems before they become more difficult to tackle, i.e. where we are now. This is a reasonable way to restore balance to the stock over time and will bolster a longer term management approach.

**Tier 4, Option A: Do not defer management action** for all of the reasons already discussed.

**4.2.2 Measures to Address Recreational Release Mortality:** I will leave it to others to argue over recreational release mortality. Suffice to say I believe it is something we should and can address in a reasonable manner through outreach and education as outlined below. I support **sub-option C1**. I have seen stripers brought onboard using gaffs that did not appear from my vantage point to be within the slot. Sub-option C1 would eliminate this possibility and is not necessary for anyone who knows how to handle a striped or cares for the well-being of the stock. I support **sub-option C2** as well. It only makes sense to require the return of a fish caught via a prohibited method to the water without unnecessary injury. If not, there would be no reason for the prohibition in the first place.

**Option 3, Outreach and Education:** I support **sub-option D1**. I think states should be required to promote best practices for handling and releasing stripers, and should be required to report on public education and outreach efforts in annual compliance reports. Voluntary action in this area is subject to the whim of the person in a given position, as well as the politics of the day. States say they are already doing these things so making it a requirement shouldn't be a burden.

**4.4.1 Recruitment Assumption for Rebuilding Calculation:** I support **option B**. It is clear that there has been extraordinarily poor recruitment over the past three years. Using the poor recruitment regime in the rebuilding calculation is not an assumption, it's reality.

**4.4.2 Rebuilding Plan Framework:** Please implement **option B**. I struggle with this one as the role of public comment cannot be overstated in this process. But, because of prior deficiencies in action, the board should be given the latitude to act quickly in the face of new information, such as the update to the stock assessment due out at the end of 2022.

**4.6.2 Management Program Equivalency:** I support **option B**; restricting the use of conservation equivalency based on stock status via **sub-option B1-a**, i.e. conservation equivalency should be prohibited when the stock is overfished. The uncertainty and patchwork nature of conservation equivalency is a questionable practice on a good day but when the stock is clearly in trouble, standardization based on sound science is required. Under **option C**, I

**Patrick H. Cassidy**

31 Alder Lane Harwich, MA 02645 508-246-3757 [patrick@capecodonthefly.com](mailto:patrick@capecodonthefly.com)

support **sub-option C3**, restricting the use of Marine Recreational Information Program estimates associated with a percent standard error greater than 30 percent. Under **option D**, I support **sub-option D2** as a means to ensure conservation equivalency meets the goals of the coastwise management plan. It is a good middle ground for doing so when compared with the other sub-options in this option. Under **option E**, I support **sub-option E2**. States must not be allowed to skirt their responsibilities based on the claim that because they take more, reductions in take will cause them a greater harm. They should be held to a standard based on their effect on the coastwise fishery, whether that is larger or smaller.

I recently took part in the Gulf of Maine Research Institute's Marine Resource Education Program, where scientists, managers and anglers of various stripes sat in the same room to discuss how these types of decisions are made. It was enlightening how much everyone involved cared about the outcome but also how willing they were to listen to and learn from each other. I hope my comments play some small part in helping you make your decisions and appreciate you taking the time to read them.

Tight lines,



Patrick Cassidy  
508-246-3757  
[patrick@capecodonthefly.com](mailto:patrick@capecodonthefly.com)  
[capecodonthefly.com](http://capecodonthefly.com)



*Cape Cod on the Fly is catch and release only for striped bass.*

cc: Mike Armstrong, Massachusetts Division of Marine Fisheries  
Raymond Kane, Cape Cod Commercial Fishermen's Alliance  
Dan McKiernan, Massachusetts Division of Marine Fisheries  
Massachusetts Rep. Sarah Peake  
Rick Jacobson, U.S. Fish & Wildlife Service  
Patrick Paquette, Massachusetts Striped Bass Association  
Douglas Amorello

From: [Timothy Petracca](#)  
Sent: Thursday, April 14, 2022 8:19 AM  
To: [Comments](#)  
Subject: [External] Draft Amendment 7  
Attachments: Letter to ASMFC Ammendment 7 Public  
comment MSBA April 2022.pdf

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Categories: Auto Replied

Dear Emily,  
Thank you for your hard work. I watched the YOUTUBE prep presentations and attended the public meeting for MA. You do yeoman's work in a complex area.  
Please see attached and note my support for the positions enumerated.  
Thank you and Keep Up Your Great Work!  
Tim

--

Timothy J. Petracca, Sr.  
435-901-0831  
[tim.petracca@gmail.com](mailto:tim.petracca@gmail.com)



## **Public Comment on Striped Bass Draft Amendment**

Robert T. Brown, Sr.  
38232 Palmer Road  
Colton Point, Maryland 20626

The MRIP estimate for recreation fishery is so vague that no scientific data has any credibility and should not be a best science available. The young of the year index, which is done each year, had a loss of 17 days due to COVID-19 related sickness. What effect does that have on numbers this year? This brings up multi-fish management plans and effect on recruitment and this brings us to the predator fish the evasive Blue Catfish which has made residents in all rivers of the Chesapeake Bay. See enclosed: Potomac River harvest in 2021 of 2,412,887 pounds this is just for the Potomac River and what effects does it have on other tributaries? What effect does it have on Fish Eggs and young of the year?

Amendment 7 needs to take a conservative approach to protect our fishery not a knee jerk reaction. The conservation equivalency is a valuable tool, is needed in fishery management. Remember back in 2018 the benchmarks were raised some scientist said it was too high to maintain and this is showing that they may be right.

Please take these comments in consideration when evaluating Amendment 7 and do the right thing. Proceed with a conservative fishery management plan as we are trying extremely hard to ride the Bay and Tributaries of the Evasive Blue Catch Fish.

Thank you

**COMMISSIONERS:**

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Chairman

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(PROXY LYNN FEGLEY) (MD)  
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MARYLAND - VIRGINIA  
"Potomac River Compact of 1958"

**Potomac River Fisheries Commission**

P.O. Box 9  
Colonial Beach, Virginia 22443  
[www.prfc.us](http://www.prfc.us)



**OFFICERS:**

MARTIN L. GARY  
Executive Secretary

MICHAEL C. MAYO, ESQ.  
Legal Officer

**TELEPHONE:**  
(804) 224-7148

**FAX:**  
(804) 224-2712

**E-MAIL:**  
[contactprfc@gmail.com](mailto:contactprfc@gmail.com)

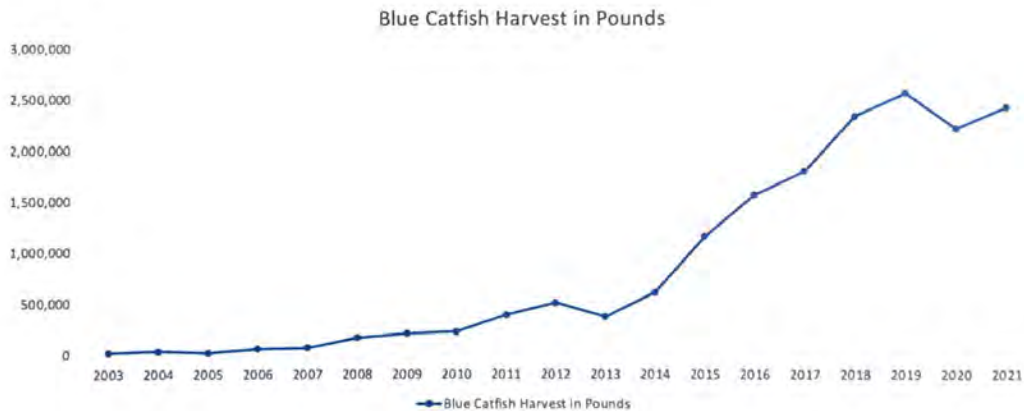
April 12, 2022

Mr. Robert T. Brown  
Coltons Point, MD

Dear Mr. Brown,

Per your request, please find the following two graphics illustrating the harvest of Blue Catfish from the jurisdictional waters of the Potomac River Fisheries Commission.

## PRFC Blue Catfish Harvest 2003-2021



## PRFC Blue Catfish Effort Data

	Total (lbs)	% FP	% TL	% GN	% PN	% TOTAL
2003	23,042	58.9%	33.4%	0.2%	4.8%	97.3%
2004	36,951	36.8%	35.6%	5.2%	18.2%	95.7%
2005	21,884	59.4%	23.3%	3.8%	1.4%	87.9%
2006	61,110	52.3%	32.4%	7.4%	2.1%	94.2%
2007	71,197	46.7%	23.7%	22.9%	0.6%	94.0%
2008	166,329	51.3%	36.5%	8.5%	0.1%	96.4%
2009	208,521	59.5%	27.2%	10.1%	0.0%	96.8%
2010	225,866	58.9%	19.7%	16.3%	0.2%	95.1%
2011	389,609	41.2%	17.4%	22.9%	16.0%	97.5%
2012	505,709	40.9%	29.1%	26.7%	0.4%	97.1%
2013	371,652	29.2%	50.5%	15.2%	0.1%	95.0%
2014	608,875	35.8%	51.1%	8.8%	0.9%	96.5%
2015	1,157,747	34.1%	53.8%	10.2%	0.3%	98.3%
2016	1,564,509	28.4%	61.7%	5.9%	0.9%	96.9%
2017	1,795,034	24.2%	57.4%	8.5%	0.2%	90.4%
2018	2,332,318	20.5%	61.0%	4.8%	13.2%	99.5%
2019	2,554,594	19.3%	71.6%	4.2%	3.7%	98.9%
2020	2,206,059	15.6%	69.9%	11.3%	1.2%	98.0%

If you have any further questions, please do not hesitate to ask.

V/R,



Martin L. Gary  
 Executive Secretary  
 Potomac River Fisheries Commission  
 P.O. Box 9  
 Colonial Beach, VA 22443  
 (804)456-6935  
[martingary.prfc@gmail.com](mailto:martingary.prfc@gmail.com)  
[www.prfc.us](http://www.prfc.us)

From: [Phillip Sheffield](#)  
Sent: Thursday, April 14, 2022 12:27 PM  
To: [Comments](#)  
Subject: [External] Amendment 7  
Attachments: Video.mov

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Categories: Auto Replied

Thank you for allowing me to express my thoughts regarding Amendment 7 of the Atlantic States Marine Fisheries Commission. First and foremost, you couldn't have made this more difficult to decipher for the average recreational fisherman and woman. If you get a low turnout of comments, this will be the primary reason!

I am from Mystic, CT. Dr. Justin Davis is the commissioner on the ASMFC for CT.

I am writing because I am appalled at the lack of concern you are taking to bring back an overfished striped bass fishery. I live on Mason's Island at the mouth of the Mystic River here in CT. I have been very passionate as a recreational salt water fly fisherman for over 60 years. Striped bass are my favorite target species. All are caught and revived using barbless hooks on flies only. I have lived and fished here for over 40 years. I saw a very concerning decline in my catch rate over 10 years ago and for the record I do not, as one of your commissioner's stated, practice catch and release as a form of playing with the fish! I stopped targeting striped bass, for the most part, five years ago out of respect for the decline of this flagship species. I understand catch and release mortality is harming this population of striped bass. If I do go with a friend I limit my catch and revive rate to only five.....ten striped bass max per outing. I keep none. I worked very hard in my later years so I could retire early to enjoy fishing on a daily basis. During the striped bass season. What a let down!

Please.....please .....please do more for this fishery and stop dragging your feet thinking the science says the sustainability for consumption and commercial fishing is endless! It is not.

After the moratorium of the 80's, more could have been done to preserve these fish from the downward spiral. The slot limit could have been altered. You did nothing and look where we're at now! You all know the October assessment is going to look dismal at best yet you sit on your hands and wait....wait..wait. Enforcement is understaffed and poaching is rampant. Just look at what your idea of Conservation Equivilency did to the 2011 class bass and as you publicly stated, "We missed the boat on that one.". The bass hardly had a chance to leave MD thanks to the ridiculous 18 inch slot limit. Please stop supporting catch to kill and the commercial/six packs that will collapse this fishery! Make bycatch count towards total quotas for the commercials.

Below are my option choices  
, where as ultimately, I would prefer another moratorium because striped bass management has failed!

Best regards,

Phillip F. Sheffield  
12 Nauyaug Point Road  
Mystic, CT 06355

869-389-7598

[bonefishmon@aol.com](mailto:bonefishmon@aol.com)

**4.1 Management Triggers:**

Tier 1:

- Option A1
- Option B1
- Option C1

Tier 2:

- Option A2
- Option B1
- Option C1

Tier 3:

- Option A3
- Option B2

Tier 4:

- Option A

**4.2.2 Recreational Release Mortality**

- Option A
- Option B1: Opposed
- Option B2: Opposed
- Option C1
- Option C2
- Option D1

**4.4.1 Rebuilding Plan**

Option B

**4.4.2 Rebuilding Plan Framework**

Option B

**4.6.2 Management Program Equivalency**

- Sub-Option B1a
- Sub-Option B1c
- Sub-Option B2b
- Sub-Option C3
- Sub-Option D3
- Sub-Option E2

From: [Taf Schaefer](#)  
Sent: Thursday, April 14, 2022 3:33 PM  
To: [Comments](#)  
Subject: [External] Draft Amendment 7

---

Categories: Auto Replied

Hello,

I am writing in regard to the Draft Amendment 7 to the **Interstate Fishery Management Plan for Atlantic Striped Bass**. These are my own comments and are not part of any form letter.

Thank you for your extensive work and I appreciate the open comment period and hope that my small contribution will add to the cumulative assessment of the comments from people in the fishing industry **whose opinions carry far greater weight than my own.**

My point of view is from artist/naturalist who has been fishing her whole life, first on Cape Cod, then Florida, later on with my kids in the Chesapeake Bay and now with my son Captain Kyle Schaefer, a saltwater guide in Maine. I have been immersed in the lore of Striped Bass from a child on. Now I draw them, carve them in wax and cast bronze buckles and make jewelry personifying their grandeur. I firmly believe our culture is tied to our fisheries and that Stripers reside in the top tier of the list of fish who capture our imaginations and now, desperately need our protection. I am conservation minded designer, sculptor and artist and I **urge the Board to take decisive action to rebuild the fishery and establish management reforms that position the Atlantic striped bass stock for long-term abundance and stability.**

There are a few specifics in Draft Amendment 7 that I would like to reiterate as key features I completely agree with:

1. The prohibition on the use of gaffs to land and release Striped Bass makes so much sense, because how can a catch and release program

work when gaffing a fish surely kills it. Switching to safer alternatives seems to be common sense and readily doable.

2. Aiding the endeavors to increase the spawning stock seems paramount to a Striped Bass population recovery.

3. Protecting the spawning grounds of the Striped Bass is the key to growing their numbers and increasing the population.

4. While the data in the Amendment is complex, I agree that increasing size limits from 26" to 38' in the commercial fisheries would benefit the Striped Bass population.

5. The individual states that reside along the migratory routes of the Striped Bass should be encouraged to do their best in protecting their fish populations and if necessary, strong regulations should be put into effect to achieve the goals set forth in Amendment 7.

Please take this opportunity to position this treasured species for recovery and long-term success.

Thank you for your time and consideration, Taf Schaefer



34 Front St. Unit 44  
Exeter, NH 03833  
603-969-3060  
[taf@tafschaefer.com](mailto:taf@tafschaefer.com)  
[tafschaefer@me.com](mailto:tafschaefer@me.com)

**From:** [Raymond Lynch](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Save Striped Bass  
**Date:** Saturday, April 16, 2022 12:01:53 AM

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I am writing as a concerned angler for the priority of rebuilding the striped bass stock. Delaying action is no longer an option. I fully support the efforts of groups such as ASGA who are advocating for science based management and no longer allowing the can to be kicked down the road.

Ray



**From:** [Jim Tryforos](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Saturday, April 16, 2022 12:01:00 AM

---

Dear ASMFC staff,

I respectfully submit my comments on Draft Amendment 7 to the Striped Bass plan.

Issue 1 - The current goals and objectives, while very general and relatively vague, seem appropriate at the strategic level.

Issue 2 - Changing biological reference points because we can't meet the numbers based on the existing reference points is a recipe for disaster. The lack of success in restoring the striped bass population under the current rules suggest that there's something wrong with how the numbers have been managed in recent years. The information available in the Public Information Document is not sufficient for me to be able to form an opinion on the appropriate course of action.

Issue 3 -

Issue 4 - I believe that rebuilding the stock quickly is more important than mitigating impacts to fisheries. if we worry too much about mitigating impacts to fisheries, we won't have any fisheries left.

Issue 5 - I think that we should minimize separate regional management programs. If the science still supports a separate regional program for the Chesapeake Bay then keep that one. A proliferation of separate regional management programs creates more opportunities for abuse. See conservation equivalency below.

Issue 6 - I believe that CE should not be part of the Striped Bass program. It's an area that's ripe for abuse, and creates situations where political and economic interests can impact decisions that are ultimately not in the fishery's long term best interest. If we must have some form of CE, it should be as restrictive as possible, limiting the states' latitude as much as possible.

Thank you for the opportunity to provide comments.

James N. Tryforos  
11 Forest Road  
Glen Rock, NJ 07452  
201-835-3831

--

Jim Tryforos  
[jimtryforos@gmail.com](mailto:jimtryforos@gmail.com)  
201-835-3831

**From:** [Jackson Murphy](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Saturday, April 16, 2022 12:00:00 AM

---

Dear Ms. Franke,

Thank you for the opportunity to comment on Draft Amendment 7 to the Atlantic Striped Bass Fishery Management Plan.

I am a recreational surfcaster in Massachusetts who has fished for striped bass for over 20 years. The decline in striped bass stocks and lack of spawning success in recent years is deeply concerning.

Because striped bass are a migratory species, I believe that the successful rebuilding of this fishery requires a coordinated effort among all states they populate along the Atlantic coastline. That is why I support sub-option B1-a of section 4.6.2 Management Program Equivalency to restrict conservation equivalency programs when the stock is at or below the biomass threshold. Furthermore, within that section I support sub-option C3, sub-option D2, and sub-option E2.

I also support the following measures of section 4.2.2 to address recreational release mortality: sub-option C1 and sub-option C2, along with sub-option D1 which requires states to promote best striped bass handling and release practices through public education and outreach campaigns.

Thank you for your consideration,

Jackson Murphy  
Boston, Mass.

**From:** [Peter Heinbockel](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 11:59:34 PM

---

Hello,

My name is Peter Heinbockel. I developed my passion for striper fishing as a kid while visiting my grandmother on the north shore of Long Island, NY. I remember the day I caught my first striper. There was a feeding frenzy unlike anything I have seen since. The peanut bunker were packed so thick to the shore, you couldn't see the bottom, except for when bass came cruising within feet from the shoreline. Since then I've chased them throughout the northeast from Maryland to Massachusetts.

A regulatory concern of mine is on the commercial side.

It makes me sick walking into a grocery store, and seeing a schoolie striper sitting on ice. It's always a whole fish that looks to be 12-18" long. I don't believe in keeping the big fish, but I believe in the slot limits where it's a "rarer" size fish that needs to be caught to keep. Everyone catches schoolies though. With the current size limits for commercial fisherman and the quantity able to keep, I believe a disservice to the striped bass fishery is being done before the fish even have a chance to mature.

Respectfully,

Peter Heinbockel

**From:** [Jake Hardy](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 11:59:01 PM

---

Dear Emilie Franke and the ASMFC Striped Bass Management Board,

Thank you for considering my comments on Draft Amendment 7 and all your work during this public comment period.

I'm a surfcaster in NY, and don't speak for a club, business, or any organization, but need to emphasize my frustration with the board's inability to maintain and rebuild the stock over the last two decades. During that time, anglers warned management of the impending decline, but the board failed to listen and act. It's a depressing reality for all of us who love striped bass fishing, and exactly why a lot of us have lost faith in the ASMFC.

Now that the SSB is at a 25 year low, it's crucial the board takes meaningful action to manage for abundance and long-term stability. I hope the board implements a more cautious approach to risk management, ensures all regulations are enforceable, and guarantees states will not use conservation equivalency to overharvest and undermine rebuilding goals, and lastly holds itself accountable to its own management triggers targets and thresholds.

With this in mind, these are my preferences for Draft Amendment 7.

#### 4.1 Management Triggers:

##### Tier 1 Fishing Mortality Management Triggers

Option A1

Option B1

Option C1

##### Tier 2 Female SSB Management Triggers

Option A2

Option B1

Option C1

### Tier 3 Recruitment Triggers

Option A3

Option B2

### Tier 4 Deferred Management Action

Option A

### 4.2 Recreational Release Mortality

Option B1 Not in favor

Option B2 N/A Not in favor

Option C1, C2

Option D1

#### 4.4.1 Rebuilding Plan

Option B

#### 4.4.2 Rebuilding Plan Framework

Option B

### 4.6.2 Management Program Equivalency

Sub-Option B1a

Sub-Option C3

Sub-Option D3

Sub-Option E2

**From:** [Robert John](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7 comment  
**Date:** Friday, April 15, 2022 11:58:00 PM

---

Dear Atlantic States Marine Fisheries Commission,

I write today to comment on the Amendment 7 options for Striped Bass management. I have been fishing for Striped Bass for 30 years, mostly in Massachusetts but also in New Hampshire and Maine. I have noticed a significant decline in catch rates, and of larger Striped Bass, of over 20 pounds, in the last 6-8 years. Please do something to stop this decline of the Striped Bass population.

I want my two young sons to have the joy of fishing and catching Striped Bass as I have had.

For future years please consolidate a 149 page report into something more manageable for the average person fishing. I took a fisheries management in college, so I somewhat understand the complexities of fisheries management decisions. I would request that a more "user friendly" document be produced for future Amendments.

For 4.1 Management triggers I favor Tier 1 Option, Sub-option A1.

For Tier 2 Options, I favor Sub-option A2 and Sub-option B1.

For Tier 3 Options I favor Sub-option A3 and Sub-option B2.

For Tier 4 Options I favor Option A. I would simply recommend requiring circle hooks for all species, above say a 1/0 hook.

For 4.3.2.1 Commercial Quota Transfers, I would recommend the current practice of no transfer.

Thank you for taking this input.

For Future Tight Lines,

Dr. Robert John

**From:** [Bob Strassel Jr.](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 11:57:24 PM

---

Dear Ms. Franke and members of the Atlantic Striped Bass Management Board of the Atlantic States Marine Fisheries Commission,

As a recreational fisherman growing up in Huntington, New York on the North Shore of Long Island Sound I have seen the striped bass fishery declining and depleted. Striped bass are overfished, and as recent data indicates, the spawning stock biomass is at a twenty-five year low.

Without hesitation, the time to act is now to preserve this historic and iconic east-coast fishery, not just for my generation but for generations to come. I cannot comment on all of the draft proposal, but please consider the following comments:

#### 4.1 Management Triggers

##### Tier 1: Fishing Mortality (F) Triggers

I believe that speed and time are of the essence regarding protecting the striped bass fishery. I firmly believe and support sub-Option A1 (status quo): Reduce F to a level that is at or below the target within one year.

##### Tier 2: Spawning Stock Biomass Triggers

The time is now to put in place a rebuilding plan! I support as a reasonable timeframe, Sub-Option A2: Two-Year Deadline to Implement a Rebuilding Plan. It is highly realistic that the Board should implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

##### Tier 3: Recruitment Triggers

Using reasonable analysis and a combined approach to this trigger, Sub-option A2 seems to be the best option. The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA) shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

##### Tier 4: Deferred Management Action

Because time is of the essence and there can be no delay, I recommend Option A (status quo). This appears as the best option and least bureaucratic for speedy action and implementation. No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

#### 4.2.2 Measures to Address Recreational Release Mortality

##### Option C: Additional Gear Restrictions

I believe a combination of enforcement and education are the key to help saving this fishery. I can't imagine why anyone would gaff a fish if they know it will be released or if there is any question. Non-lethal methods of taking striped bass from the water are key to their survival. I

support Sub-Option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

#### Option D: Outreach and Education

Outreach programs work, demonstrating and educating on the proper handling of fish will help bring down the mortality rate and increase survival of the striped bass species. I support Sub-Option D2:

It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports.

#### 4.4 Rebuilding Plan

##### 4.4.1 Recruitment Assumption for Rebuilding Calculation

I feel that the best plan and most reasonable would be Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

Thank you for the ability to comment. I hope my comments are valuable and contribute to furthering a wonderful and beautiful resource for my children, and my children's children to enjoy.

Sincerely,

Robert G Strassel Jr.  
Cos Cob, Connecticut  
Father & Fisherman



**From:** [Byron Halavik](#)  
**To:** [Comments; stripercomments@gmail.com](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 11:56:44 PM

---

Dear Atlantic States Marine Fisheries Commission Striped Bass Board-

I am writing in support of aggressive action to protect the Striped Bass population.

I am an avid Striped Bass fisherman. I have fished in many different styles and locations for this species but mostly focus on fly fishing and conventional tackle from the surf. Being a mostly land based fisherman having healthy stocks of fish is extremely important for productive outings. I have witnessed the most recent decline first hand and it is extremely evident if you fish from shore and a variety of locations. What is most noticeable is that there are extremely hot zones of incredible fishing but these punctuate vast areas of little to no activity. These areas of good fishing are the exception to the otherwise depressing lack of fish that has become normal around many of the traditional fishing areas along the shore. The fisheries decline is also noticeable in the very well sorted size classes of fish. There is very little mixing between size classes and each group is generally isolated from the next. I understand these are schooling fish and they aggregate within schools of similar size classes but I would expect a healthy fishery to have a greater mix of size classes present. There are obviously many ongoing natural processes as well as significant anthropogenic influence, outside of fishing activity, that affect this species and we have very little control over this but what we do have control over is the ability to regulate the fishery itself. Having knowledge of these outside negative influences on the health of our fishery makes the decision to air on the conservative side of regulation that much easier. There has also been a significant proliferation of technology that aided fishermen in targeting striped bass that was not the same as any other time in history. The advent of real time social media and incredibly easy to use and accurate GPS, sonar, radar, and other navigational tools has allowed more people than ever to target Stripers with deadly and repeatable precision. This has created a situation where even with declining stocks fishermen are leveraging these technologies and still finding and catching these fish as if nothing has changed. This has created a situation where the decline is not obvious to many fishermen especially those who are younger and more tech savvy. With all this in mind it is more important than ever to air on the side of caution. Since the most recent peak of Striper abundance I believe that the board has been overly influenced by a loud minority of voices that do not have the Striped Bass' best interest at heart. It is time to steer the misguided management of this species back towards abundance.

Since Amendment 6 was adopted in 2003 the stock has declined to overfished levels because excessive overfishing has been allowed. I feel that some significant changes are needed to reverse this trend, and that the overall goals for Amendment 7 should be to recover the Striped Bass stock as soon as possible! You must implement policies to ensure target levels are maintained long-term after recovery.

Our children and the following generations deserve to fish for Striped Bass and have a reasonable chance of success . It is a fish for all and an important resource for our entire nation and all who visit.

To accomplish these goals, I urge the Board to include the following options in Amendment 7:

#### 4.1 Management Triggers

Tier 1 - A1, B1, C1

Tier 2 - A2, B1, C2

Tier 3 - A2, B2

Tier 4 - A

#### 4.2.2 Recreational Release Mortality

Sub-Options C1, C2, D2

#### 4.4 Rebuilding Plan

4.4.1 Option B

4.4.2 Option B

#### 4.6.2 Management Program Equivalency

Sub-options B1-a, C3, D2, E2

As the board making this decision, the fate of the Striped Bass Fishery is largely in your hands, and I sincerely hope you take these suggestions to heart.

Sincerely,  
Byron Halavik

--

Byron Halavik  
[bhalavik@gmail.com](mailto:bhalavik@gmail.com)  
401.932.2558 (cell)

**From:** [ryan salmon](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 11:55:16 PM

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To whom it may concern (ASMFC),

My name is Ryan Salmon and I'm 31 years old. I'm from a town along the Massachusetts coast called Scituate. I grew up with the Atlantic ocean as my back yard. My whole life has revolved around the ocean whether realizing it or not. Looking at my life now I've come to understand how lucky I was growing up where I did. Being so close to the water I developed a passion for fishing especially targeting the local favorite Striped Bass. Fishing has always been a passion actually more of an obsession for me throughout my youth into my adult years. Catching bass and blues from the beach mid day all summer was the normal for me as a kid. Nowadays you don't see that. This striped bass population is dwindling and it's getting a lot harder to find these fish. It's not the same as it once was and I hate that. I want people to experience great striped bass fishing. One thing that fishing has gave me is this...Always turning to fishing whenever times are good or especially when times are bad. Could always rely on fishing that way and that's important to me. I want others to be able to experience fishing that the same lucky way I have. Sustaining this population is so important for our future generations. We need that help from you to let others have fishing impact their lives in whatever positive way it may be. Please address this issue. We depend on it.

Sincerely,  
Ryan Salmon  
[ryansalmon19@yahoo.com](mailto:ryansalmon19@yahoo.com)

**From:** [Benjamin Masse](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 11:51:29 PM

---

Hello,

My name is Benjamin Masse, and I've been an avid striped bass anglers since I was 10 years old. I am sending you this email in an effort to strongly voice my support for improving practices for striped bass conservative and making marked improvements to the way in which the fishery stock is managed. Please do not continue to mismanage this extremely valuable and culturally important species. I hope that as our publicly appointed representatives, you will listen to the strong public outcry overwhelming in support of better conservation. If the board manages the fishery properly and builds up the stock back to a plentiful and healthy level, everyone wins; from the recreational angler all the way to commercial fisherman. To continue to knowingly overfish and deplete this valuable resource is despicable.

I support the following sub-options for the Striped Bass Amendment 7 document:

4.1 Management Triggers

4.1, Tier 1, Option A: sub-option A1

4.1, Tier 1, Option B: sub-option B1

4.1, Tier 1, Option C: sub-option C1

4.1, Tier 2, Option A: sub-option A2

4.1, Tier 2, Option B: sub-option B1

4.1, Tier 2, Option C: sub-option C1

4.1, Tier 3, Option A: sub-option A2

4.1, Tier 3, Option B: sub-option B2

4.1, Tier 4, Option A: Status quo

4.2.2, Option C: sub-option C1 and C2

4.2.2, Option D: sub-option D2

4.4.1, Option B

4.4.2, Option B

4.6.2, Option B: sub-option B1

4.6.2, Option C: sub-option C3

4.6.2, Option D: sub-option D2

4.6.2, Option E: sub-option E2

Thank you for taking my perspective into consideration.

V/R,  
Benjamin Masse  
Mechanical Engineer

NUWC Newport  
Rhode Island

**From:** [Mark Walsh](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 11:49:48 PM

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Strongly support saving the striped bass biomass...tighten up the slot all along the coast sounds good,overfished by all types of fisherman,...tighten up the hrs of the tackle shops in Jersey,overbought lures ,bait ...but seriously,what is the difference in the decline now an with the decline in the 80s 90 ...dont her anything about revisiting what worked then to bring the vy endangered fish mass back...we had a 36 38" keepah limit ,one fish day ,for 7 -8 yrs, the classes came back...then slots and size limits were re visited...hard to understand keeping a 28 30 plus inch younger stronger higher yeilding load fish instead of an older 40" plus lower yeilding load fish...whatever you do lets get it right and save,protect the decimation of striped bass up and down the coast,we all got skin in the game,i m involved for the pure joy of it all,every bit...others to make money in the biz,whatever,lets all get it right now,before its to late,which is also right now,its happening...any fisherman who cares knows it,why and how we keep doing it makes zero sense in itself....many good fisherman will police themselves to do whats right to help save the stripers...lets not contnue to screw this up,giv us something solid to work with . MDWalshski

**From:** [Alexander Colantonio](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 11:38:08 PM

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To whom it may concern,

My name is Alex and I live to catch striped bass. It is not my job, but the sole reason I go to work every day. All winter I dream of putting on my wetsuit and fishing until sunrise. It is my passion, my love, my happiest place in the world. I understand this is a luxury, to be able to enjoy this resource, without having to rely on it for my lively hood. While my financial wellbeing is not tied to bass fishing (I might have much more money without it) my mental health is. I need to be able to look forward to those nights on the rocks to get through the work week. It's a passion that no person should be denied. We must not kill the last of the buffalo for a few dollars.

I grew up in Rhode Island and have seen the fishery decline in the 10 years I have in the surf. People say the surfcaster is the canary in the coal mine, well, this canary is on life support. If action isnt taken to help protect this vital resource we will lose it. Enforcement on targeting rules may be difficult, so we need to reduce striper mortality as much as possible. Conservation Equivalency is allowing different states to kill the same body of fish different ways leading to overfishing. We need to provide this fish the protection it needs. For these reasons I have adopted the following support for options on Article 7-

Tier 1

Option A - A1

Option B - B1

Option C - C1

Tier 2

Option A - A2

Option B - B 1

Option C - C 1

Tier 3

Option A - A 2

Option B - B2

Tier 4

Option A

4.2

Option B no measure

Option C - C1,C2

Option D -D2

4.4.1

Option B

4.4.2

Option B

4.6.2

Option B - B1a

Option C- C3

Option D- D2

Option E- E2

Thank you very much for your consideration,  
Alex



**From:** [James Hollyday](#)  
**To:** [Comments](#); [justin.davis@ct.org](mailto:justin.davis@ct.org); [william.a.hyatt@snet.net](mailto:william.a.hyatt@snet.net); [Sen. Craig A. Miner](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [norwalkislandsfishing@gmail.com](mailto:norwalkislandsfishing@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 11:30:59 PM

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To Whom it May Concern,

I have fished the Long Island sound for the last 20 years, starting around the age when I was 11. I have a blog to capture my fishing experiences, it is called [norwalkislandsfishing.com](http://norwalkislandsfishing.com). I am a licensed USCG captain providing fishing charters, and I also author fishing reports to the public by way of my blog (link above) and also via the largest marina in Norwalk (email list is [info@rexmarine.com](mailto:info@rexmarine.com)) for the last 5 years.

I have seen some ebbs and flows of the fish populations, but nothing like some of the old timers whose experience on the water has eclipsed mine. What stands out is the change in the striped bass population in the last 6 or so years-there are not nearly as many fish as there once were. The bait population has fluctuated but the amount, and size, or striped bass that are being caught by me and also fisherman in my community has undoubtedly gone downhill. I have a wide population of fisherman who both contribute to my fishing blog, and those that I interact with on a weekly basis.

I feel that this fish is the pinnacle of inshore east coast fishing. Without the striped bass, tackle shops, guide outfits, party boats, and local tackle companies will cease to exist. They are the apex predator of our area, and all anglers both young and old are saying the same thing: the species is in decline.

I hope that my testimony is used when it comes to determining policy. I am happy to provide more information and references, as my word of mouth is merely heresy. In the Long Island sound, recreational anglers vastly outnumber the for-hire part and/or charter boats. I will also add that the rise in smartphones and technology has increased the value of a 'quick photo'. far over the value of a one time meal.

Thank you

James

From: [Christian Olivo](#)  
To: [Comments](#)  
Cc: [Stripercomments@gmail.com](mailto:Stripercomments@gmail.com)  
Subject: [External] Amendment 7  
Date: Friday, April 15, 2022 11:28:55 PM

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Hello,

my name is Christian Olivo.

I am from New Jersey, just like many saltwater anglers amongst the East Coast the Striped Bass fishery is important to me. Not only because recreational fishing is my hobby or passion, but because it has developed into a very positive coping mechanism for myself.

That being said I have a desire to take care of the Atlantic Striped Bass population just as much if not more than what they have taken care of me.

**I support**

**4.1**

**Tier 1:**

A1

B1

C1

**Tier 2:**

A2

B1

C1

**Tier 3**

A2

B2

**Tier 4:**

A

**4.2**

B2-A

C1,C2

D2

**4.4.1**

B

**4.4.2**

B

**4.6.2**

B1-A, B1-C

C3

D2

E2

It is extremely important that there is a change made for the better relatively soon, otherwise it will be rather hard for the Striped Bass population to bounce back AGAIN.

Sincerely,

Christian Olivo.

From: [Chris Fay](#)  
To: [Comments](#)  
Cc: [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
Subject: [External] Draft Amendment 7  
Date: Friday, April 15, 2022 11:28:53 PM

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Dear ASMFC,

First and foremost, I hope to see management strategies put in place that will put the best interests of the striped bass stock first. These strategies must provide the tools needed to properly respond to the current dire situation that striped bass are in, while also allowing proper management in the years to come.

Ideally, I would like to see strategies implemented that allows for an abundance of striped bass as seen within the past couple of decades, representative of all class sizes of fish. I want to see future generations have an opportunity to enjoy fishing for this important species, and I fully support the tough decisions that come with that goal. This fish is a vital part of our coastal economy and history, and further decimation of the stock is something that requires immediate action.

Our focus should be on the rebuilding of the stock as the #1 goal. This is going to require bold action by stakeholders, and that may result in some short-term pains for anglers for a long-term benefit for current and future generations.

The following are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1  
Support B

4.4.2  
Support B

4.6.2  
Support B1-a  
Support C3  
Support D2  
Support E2

Thank you for the opportunity to comment, and I hope that my voice and those of other conservation minded anglers will be heard.

Respectfully,

Christopher Fay

21 Christine Drive

Dartmouth, MA 02747

[cjf333@yahoo.com](mailto:cjf333@yahoo.com)

**From:** [Pete](#)  
**To:** [Comments](#)  
**Subject:** [External] AMMENDMENT 7 public comment  
**Date:** Friday, April 15, 2022 11:27:07 PM

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Dear Atlantic striped bass management board,

I am by no means an eloquent or persuasive writer, but I am a lifelong avid fisherman for striped bass. It is now time for me to pass on this past time that I love to my two sons, yet i have noticed a sharp and steady decline in the population in Rhodeisland and Connecticut over the last 5+ years... it is clear to see that the population is in trouble. I urge you to please take whatever steps are required to help ease pressure on the striped bass population, in both the commercial AND recreation sector, to ensure their future and to give these fish a chance to rebuild.

Thank you for your efforts.  
-Peter Kosciukiewicz

**From:** [Gregory Cordeiro](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 11:26:47 PM

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Dear ASMFC,

Striper Fishing has been in our family for generations. To put it simply, we'd like to continue that for future generations to come. There are so many families like ours that hold this near and dear to our hearts.

We are not only recreational fisherman, but also a small business focused on fly fishing that targets catch and release of striped bass. It is a portion of our livelihood and majority of our passion.

Not enough is being done to address the declining stock of our beloved fish. We have run out of time and we must act now. The stock has diminished exponentially over the last decade and we have witnessed this first hand.

We support the options that have been agreed upon by the ASGA as they are a strong representative of realistic balance between recreational and commercial fishing with the fish at the priority of their agenda.

Thank you for your consideration and hard work,

Joe and Greg Cordeiro

**From:** [Matthew Motek](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Management  
**Date:** Friday, April 15, 2022 11:21:36 PM

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Good Evening,

The striped bass population are on the decline and it is in the best interest for the whole east coast to do something about it. If new regulations aren't placed soon the recreational fishery and commercial fishery will collapse. This will lead to loss of jobs and business which will create a negative impact for the fishing community. Please realize that the decline of the striped bass has been getting worse and worse, if nothing will be done ASAP then there will be a point of no return and lose another fishery to overfishing.

Sincerely,

Matthew Motek

**From:** [David Sherwood](#)  
**To:** [Comments](#)  
**Subject:** [External] DRAFT AMENDMENT 7  
**Date:** Friday, April 15, 2022 11:17:51 PM

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Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board:

My name is Dave Sherwood. I am a resident of Maine and a former charter boat captain on Casco Bay. I now live on Merrymeeting Bay, on the Kennebec River, and fish for striped bass every day of Maine's summer season.

I am writing to comment on Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass.

To begin, I want to make one point clear: The emphasis of this plan **MUST** be to take decisive and immediate action to rebuild the striped bass population and to establish the necessary reforms to assure a strong, abundant and stable population into the future. Anything short of this is unacceptable to the millions of striped bass fishermen, present and future, who depend on your efforts for the recreation and livelihood.

To that end, the following is a summary of my recommendations for the key points under consideration:

#### **4.1 Management Triggers**

**GENERAL COMMENT: By and large, I support maintaining the status quo for the spawning stock biomass and fishing mortality triggers contained in the striped bass management plan, with some tweaks to guarantee timely and immediate action. I would like to emphasize that it has been THREE years since the board learned the stock has been overfished - and yet, still no comprehensive plan has been put in place to rebuild the stock. This is unacceptable and must be rectified as quickly as possible.**

Tier 1: Fishing Mortality (F) Triggers

*Option A: Timeline to Reduce F to the Target*

Recommendation: **Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year.

*Option B: F Threshold Triggers Preferred Alternative*

Recommendation: **Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

*Option C: F Target Triggers*

Recommendation: **Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass



management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

*Tier 2: Spawning Stock Biomass (SSB) Triggers*

*Option A: Deadline to Implement a Rebuilding Plan*

Recommendation: **Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment.

*Option B: SSB Threshold Trigger*

Recommendation: **Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

*Option C: SSB Target Trigger*

Recommendation: **Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

Tier 3: Recruitment Triggers

*Option A: Recruitment Trigger Definition*

Recommendation: **Sub-Option A2:** The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA) shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years. The high recruitment reference period used for this trigger may be adjusted as recommended by the TC during benchmark stock assessments. This trigger alternative has a moderate sensitivity; it is more sensitive than the status quo but less sensitive than sub-option A3.

*Option B: Management Response to Recruitment Trigger*

Recommendation: **Sub-option B2:** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

*Tier 4: Deferred Management Action*

Recommendation: **Option A (status quo):** No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the 4 Board is required to respond to that trigger regardless of when the last

management action was implemented in response to any management trigger.

### **Option B. Effort Controls (Seasonal Closures)**

I do not recommend including any seasonal closures in Amendment 7, until we have more and better science-based information on which to base those decisions. The striped bass fishery is primarily a catch-and-release fishery, hence the relatively high recreational release mortality, and while we can and should work to reduce that mortality, the currently available data are insufficient for determining how best to do so.

#### *Option C. Additional Gear Restrictions*

Recommendation: **Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

Recommendation: **Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

#### *Option D. Outreach and Education*

Recommendation: **Sub-option D2:** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns

## **4.4 Rebuilding Plan**

**GENERAL COMMENT: While I am encouraged to see the board finally considering a rebuilding plan, I ask move with urgency and consider that recruitment has been poor for several years - more delays, or less stringent rebuilding regulations, will only prolong recovery period and cause more pain for both fish and fishermen.**

### *4.4.1 Recruitment Assumption for Rebuilding Calculation*

Recommendation: **Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

### *4.4.2 Rebuilding Plan Framework*

Recommendation: **Option B:** 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 recruitment assumption specified in Amendment 7) 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

### *4.6.2 Management Program Equivalency*

**GENERAL COMMENT: Conservation equivalencies, while perhaps necessary in some scenarios, have been abused in the past and poorly executed. This must be rectified in Amendment 7.**

*Option B. Restrict the Use of Conservation Equivalency Based on Stock Status*

Recommendation: **Sub-option B1-a:** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

*Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals*

Recommendation: **Sub-option C3:** CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30.

*Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries*

Recommendation: **Sub-option D2:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

*Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries*

Recommendation: **Sub-option E2:** Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the statespecific level.

To close, I want to emphasize again the importance of immediate, bold action to rebuild the striped bass population.

I want my children to enjoy the same fishing that I did in the late 1990s and early 2000s - and for the same reasons: Because our fisheries managers had the good sense to do the right thing, at the right time.

Please act now to restore our fishery.

Thank you for considering my comments.

David Sherwood  
49 Bay View Lane  
Bowdoinham, Maine, 04008  
[dfsherwood207@gmail.com](mailto:dfsherwood207@gmail.com)

**From:** [Rex Messing](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 11:15:53 PM  
**Attachments:** [image003.png](#)

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Dear Atlantic Marine States Fisheries Commission,

My name is Rex Messing, and I currently live in Montana but have my roots in Connecticut and Maine. I work in the fishing industry, and large part of my job at our company is to focus on conservation issues in New England. Having spent almost my entire life on the East coast chasing striped bass recreationally and professionally, I am here to speak up in defense of the species I love the most.

I am adamantly of the stance that we need to manage for abundance and need to bolster our science so we understand what impacts we are having on the fishery. I wholeheartedly disagree with the Conservation Equivalencies; no state should be able to take different segments of the population when we have such abysmal diversity in the stock. We also need to act immediately in our efforts to rebuild the stock, especially if a management trigger is surpassed. Postponing any actions should be comprehensively off the table.

I have listed a summary of my position per each section of the Amendment 7 policies on the table.

4.1

Tier 1

Support A1

Support B1

Support C1

Tier 2

Support A2

Support B1

Support C1

Tier 3

Support A2

Support B2

Tier 4

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for taking into serious consideration mine and the rest of the public's stance on the legislation you are bringing to the table. We are all stakeholders in the fishery, and our voices need to be heard. Creating management policies that do not account for the vast majority of the population is irresponsible, and I expect a management board such as ASMFC to do the right thing. Please protect our fish, and create policies that show that you are taking the initiative.

**Rex Messing** | Content Producer  
177 Garden Drive  
Bozeman, MT 59718  
Ph: 203-241-6753



**From:** [Cow Hunting](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 11:13:49 PM

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Atlantic Striped Bass Management.

I am Ben Hung. I have been fishing for Bass for 17 years. I, like many others, find ourselves in every cast! All this is possible thanks to the Striped Bass.

There is no need to mention the money we HAPPILY spend buying all sort of things we don't actually need to catch a fish we think we understand and appreciate.

Let's not fool ourselves with so many views on one single objective, All efforts MUST be directed to save the Striped Bass, for us and for next generation who undoubtedly would need to find themselves too.

You know all about the facts no need to anchor on that.

Do the right and the SANE thing for ALL of us who needs the Basa to thrive!

I support

Tier 1

Option A Support A1

Option B Support B1

Option C Support C1

Tier 2

Option A Support A2

Option B Support B1

Option C Support C1

Tier 3

Option A Support A1

Option B Support B1

Tier 4

Support A

4.2

Option B support no measures

Option C Support C1,C2

Option D Support D2

4.4.1

Support B

4.42

Support B

4.6.2

Option B support B1-a

Option C Support C3

Option D Support D2

Option E Support E2.

Thanks for doing the Just and Right thing for THE STRIPED BASS!

Best Regards

Ben Hung

**From:** [Tom Pirraglia](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 11:12:24 PM

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Thank you for the opportunity to comment on for Amendment 7 to the Interstate Fishery Management Plan For Atlantic Striped Bass. I am a resident of New York State and am a member of the Montauk Surfcasters Association and Farragut Striper Club. I respectfully submit that the Commission act with urgency to protect the striped bass stock from further overfishing. This has been a gradual but continuous downtrend years in the making as a result of poor management. Amendment 7 must result in strict guidance that compels rebuilding of the stock.

I would like to also remind the commission of the economic importance of striped bass for the east coast of the United States. This applies to both the recreational and commercial sectors of our fishery. Your decision will have a direct impact on revenue for tackle shops, charter and party boats, lodgings, dining, retailers, gas stations, auto and boat dealers, and countless other businesses that depend on a healthy striped bass population. A further decrease in striped bass will also result in loss of sales tax revenue at the local and state level.

After careful review, I have decided to endorse the following options.

#### **4.1 Management Triggers**

##### **Tier 1-Fishing Mortality Management Triggers**

Option A1

Option B1

Option C1

##### **Tier 2-Female SSB Management Triggers**

Option A2

Option B1

Option C1

##### **Tier 3-Recruitment Triggers**

Option A3

Option B2

##### **Tier 4 Deferred Management Action**

Option A

#### **4.2.2 Recreational Release Mortality**

Option A

Option C1

Option C2

Option D1

#### **4.4.1 Rebuilding Plan**

Option B

#### **4.4.2 Rebuilding Plan Framework**

Option B

#### **4.6.2 Management Program Equivalency**

Sub-Option B1a

Sub-Option B1c

Sub-Option B2b

**Sub-Option C3**  
**Sub-Option D3**  
**Sub-Option E2**

Respectfully submitted,

Thomas A. Pirraglia



**From:** [Justin Gonzalez](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 11:09:23 PM

---

Dear Ms. Franke and the Atlantic Striped Bass Management Board:

My name is Justin Gonzalez, a 21 year-old surfcaster from western Massachusetts. My father and I stumbled into the sport two years ago, so we are still relatively new on the scene. Our target species is striped bass and we practice catch-and-release.

Residing in western MA—quite the ride from any saltwater’s edge—it is difficult to find the time to fish as much as we’d like, but we do the best we can. Early in the season you may find us casting along the banks of the nearby Connecticut River, but come summer, we willingly make the two hour commute to the Cape Cod Canal nearly every weekend. We’ll load the car, leave the house around 3:00 a.m., fish anywhere from 6-12 hours, pack up when we’ve had enough, and return home the same day. Not once has it felt a chore; we are totally obsessed, endlessly driven by the opportunity to come face-to-face with one of America’s most prized fish—the aquatic equivalent of the bald eagle.

Having said that, after just one spring and two summer/fall fishing seasons, we are very much aware of the concern regarding the current (and future) state of the fishery. We have logged 400+ hours on the water and besides the countless memories and friends we’ve made, we have very little to show for it. We ride our bikes along the Canal and see nothing—no activity, no one catching. The lack of striped bass/striper activity we’ve seen at one of the top surf fishing destinations in the country is extremely worrisome... and very telling. We are aware of the last collapse of the fishery, and anyone willing to open their eyes will see we’re heading down the same dark path.

These fish are resilient, and they were here long before us. They provided native Americans with a reliable food source in pre-colonial times. They were here in the founding days of our nation, helping the Pilgrims survive their first cold, long, and harsh Massachusetts winters. Today, not only are they arguably the most popular sport fish along the East and West coasts, they are essential to those reliant on the fishery for income, both directly by way of commercial fishing/guide service and indirectly by tackle shop owners who line the striper coasts—dependent on their customers to keep coming back. It is our duty to simply not let this cherished, historic species die.

I thank you for this opportunity to comment. However, I am sad to say myself and my fellow anglers are concerned for the ability of the ASMFC—as currently configured—to deliver on their mission of “leaving healthy and abundant marine fisheries for the next generation to enjoy.”

The fate of this fishery is in our hands and even more so, your hands.

**I support the following options:**

**Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

**Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

### **Tier 3**

Option A- Support A2

Option B- Support B2

### **Tier 4**

Support A

#### **4.2**

##### **4.2.1**

Eliminate conservation equivalency. Institute coast wide slot limit (28"-<35") & 1 fish per bag limit (year-round).

##### **4.2.2**

Option B- Support B2 (B2-a & B2-b)

Option C- Support C1 & C2

Option D- Support D1

##### **4.4.1**

Support B

##### **4.4.2**

Support B

##### **4.6.2**

Option B- Support B1-a

Option C- Support C3

Option D- Support D2

Option E- Support E2

**From:** [Edward Briganti](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Friday, April 15, 2022 11:09:11 PM

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Dear ASMFC

I live in Darien, CT and I am responding to the request for public comments on Amendment 7. I was introduced to fishing 14 years ago by my mother, who signed me up for an Orvis saltwater fly fishing school. I now have two young daughters and want the striped bass to be there in abundance for my kids like it was for me when I was starting out. The striper situation has been disturbing to me for at least the last 5-7 years.

Here are my choices for each proposed regulation.

4.1

Tier 1

A1

B1

C1

Tier 2

A2

B1

C1

Tier 3

A2

B2

Tier 4

A

4.2

B- None

C1, C2

D2

4.4.1

B

4.4.2

B

4.6.2

B1-a

C3

D2

E2

I get so much out of fishing for stripers, particularly on the fly. Recently I've switched to primarily spin fishing in the Long Island Sound as I've witnessed just how scarce the fish can be making approaching them on the fly overly challenging. I want these fish to be around in abundance and to rebuild the stock. I probably spend close to \$10-15k per year on northeast striper fishing between gear and tackle purchases, fishing guides, fly tying materials, my boat and other marine related services and items. I really don't want to take up golf! But if the fish aren't there I will do something else and the economy I supported will be impacted, which is a shame because they are some of the hardest working passionate people I know. But really you should save the striper because it's our native local fish, and it has inherent value beyond its economic value.

Please stand up for the striped bass, and end overfishing as quickly as possible.  
Please manage stripers for abundance, and not yield!

Thank you

Eddie Briganti

Darien, CT

--

Edward R. Briganti

(203) 644-0561

**From:** [John Harrington, Jr.](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 11:07:25 PM

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I agree with ASMFC's positions:

Under 4.1, Tier 1, I support Sub Option A1, B1, and C1

Under 4.1, Tier 2, I support Sub-Option A2, B1, and C1

Under 4.1, Tier 3, I support Sub-Option A2 and B2

Under 4.1, Tier 4, I support Option A

Under 4.2.2, Option C, I support Sub-Option C1 and C2

Under 4.2.2, Option D, I support Sub-Option D2

Under 4.4.1, I support Option B

Under 4.4.2, I support Option B

Under 4.6.2, Option B, I support Sub-Option B1-a

Under 4.6.2, Option C, I support Sub-Option C3

Under 4.6.2, Option D, I support Sub-Option D2

Under 4.6.2, Option E, I support Sub-Option E2

Thank you for your consideration.

-John Harrington

--

**John Harrington, Jr.**  
M: (610) 724-1435 | E: [john.douglas.harrington@gmail.com](mailto:john.douglas.harrington@gmail.com)

**From:** [Eddy Kooyomjian](#)  
**To:** [Comments](#)  
**Subject:** [External] Comment for Amendment 7  
**Date:** Friday, April 15, 2022 11:07:08 PM

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My name is Eddy Kooyomjian Jr and I am an avid boat fisherman from the state of Massachusetts. Striped Bass are a big part of my fishing season and I would like to see the stock and overall health of the population sustained over future generations. I feel the current state of the stock is that it is overfished and the current system of management isn't working. I also feel the fishing industry and manufacturers of fishing products are not doing enough themselves to better promote methods of fishing and tackle that help with striped bass survival. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Eddy Kooyomjian Jr  
Chatham, Massachusetts  
Email: [ekooyomjian@hotmail.com](mailto:ekooyomjian@hotmail.com)

Sent from my iPhone

**From:** [Foster Lott](#)  
**To:** [Comments](#)  
**Subject:** [External] amendment 7  
**Date:** Friday, April 15, 2022 10:57:55 PM

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Striped bass definitely need help if we are to see the population rebuild and especially if we want to see more large fish in the population. Future overfishing needs to be avoided. I am 73 years old and hope to enjoy striped bass fishing as long as I can. What is especially important to me is that my young nephew can enjoy fishing like I had in the good old days when 30 and 40 pounders were common place. Thanks for your consideration.

Sincerely, Foster Lott



**From:** [Pat Fin](#)  
**To:** [Comments](#)  
**Cc:** [2022stripercomments@gmail.com](mailto:2022stripercomments@gmail.com)  
**Subject:** [External] Striped bass amendment 7  
**Date:** Friday, April 15, 2022 10:54:30 PM

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Hi, my name is Patrick Finucane, I've been an outdoor enthusiasts and freshwater fisherman my entire life. After moving only several miles from the coast here in Southern Rhode Island in 2017 I've become completely obsessed with surfcasting for large striped bass. I'm 100% a catch and release fisherman since I don't actually like the taste of fish, I just love being out and in tune with nature. I am not opposed to people keeping fish for the table as long as they are following the regulations, however I feel it's long past due for those regulations to be changed to support a healthy fishery.

I can say that in just my 5 years surfcasting experience the numbers of big stripers have diminished shockingly fast. Over the last several years my skills, knowledge, research and time on the water has gotten to obsessive levels, which in return should result in more big fish being caught, however it's the opposite.

The come back of the striped bass from an almost near crash of the population in the 80's is the most successful conservation project of any fishery, and it's embarrassing that we have not learned from the past.

I'll admit I'm horrible putting things to words and reading through this amendment has not been easy but here are my choices for each proposed regulation.

4.1

Tier 1

A1

B1

C1

Tier 2

A2

B1

C1

Tier 3

A2

B2

Tier 4

A

4.2

B- None

C1, C2

D2

4.4.1

B

4.4.2

B

4.6.2

B1-a

C3

D2

E2

It really is time to manage this fishery for abundance!

Thank you for your time

- Patrick Finucane

**From:** [Brian Genovesi](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External]  
**Date:** Friday, April 15, 2022 10:52:36 PM

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My name is Brian Genovesi and I'm from Maine. For many including my self, striped bass fishing is a way a life. Communities, lifestyles and traditions have been formed from this fishery for generations and it would be devastating to lose it. Here are the choices I prefer

4.1

Tier 1

Option A-support A1

Option B-support B1

Option C-support C1

Tier2

Option A-support A2

Option B- support B1

Option C- support C1

Tier3

Option A-support A3

Option B support B2

Tier 4 support A

4.2

Option B- support no measure

Option C- support C1,C2

Option D- support D1

4.4.1 support B

4.4.3 support B

4.6.2

Option B- support B1-a

Option C- support C3

Option D- support D3

Option E- support E2

Sent from my iPhone

**From:** [Owen Mulvey-McFerron](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Striped Bass Amendment 7 Comment  
**Date:** Friday, April 15, 2022 10:48:22 PM

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Good evening,

I don't normally submit comments for this sort of thing. I'm a fisheries biologist, and I've seen time and time again where commissions and political appointees affront good science and make poor management decisions. I, like many other anglers, have become disillusioned with the way the ASMFC has managed striped bass.

That said, I'm hopeful that the commission will take the opportunity they have at hand to correct some of the historical mistakes they have made which have negatively impacted the striped bass stock.

Striped bass were the first saltwater species I ever caught when I was very little, and to this day they remain my favorite species to target. I spend thousands of dollars each year in at least ten different states chasing bass.

I haven't kept a fish in years and I have watched the fishery change over the last decade in a bad way.

Please consider the following management options for Amendment 7.

Tier 1: Fishing Mortality (F) triggers

Option A: Timeline to Reduce F to the Target

I support sub-option A1 (status quo)

Option B: F Threshold Triggers

I support sub-option B1 (status quo)

Option C: F Target Triggers

I support sub-option C1 (status quo)

Tier 2: SSB Triggers

Option A: Deadline to Implement a Rebuilding Plan

I support sub-option A2

Option B: SSB Threshold Trigger

I support sub-option B1 (status quo)

Option C: SSB Target Trigger

I support sub-option C1 (status quo)

Tier 3: Recruitment Triggers

Option A: Recruitment Trigger Definition  
I support sub-option A2

Option B: Management Response to Recruitment Trigger  
I support sub-option B2

Tier 4: Deferred Management Action  
I support Option A (status quo)

4.2.2 Measures to Address Recreational Release Mortality  
I support sub-option s C1 and C2.

Option D. Outreach and Education  
I support sub-option D2

4.4.1 Recruitment Assumption for Rebuilding Calculation  
I support option B

4.4.2 Rebuilding Plan Framework  
I support option B

4.6.2 Management Program Equivalency  
Option B. Restrict the Use of Conservation Equivalency Based on Stock Status  
I support sub-option B1-a

Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency  
Proposals  
I support Sub-option C3

Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries  
I support Sub-option D2

Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries  
I support Sub-option E2

Thank you.  
Owen

**From:** [Stefan Haller](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 10:46:21 PM

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Dear Members of the ASMFC,

I know that you are likely inundated with email comments so I will try to keep it relatively short. I've been fishing along the coast of NJ since I've been able to support the weight of a fishing rod. The coastal waters of my home state have been so important to me over the years that I went as far as completing a B.S in marine science. No other species (Flora or Fauna) seems to mean more to people in NJ than Striped Bass. Not a day goes by that I don't see the outline of a striped bass stuck onto the back of someone's car or truck. This species is special beyond words and it is clear that these fish are worth more in the water than they are out of it.

Just last evening I had a great night of fishing. I want to be able to share those nights with my future kids and grandkids. That's why I stand with ASGA and support the following measures regarding Amendment 7:

#### **4.1 Management Triggers**

Tier 1: Fishing Mortality (F) Triggers

##### **Option A: Timeline to Reduce F to the Target**

**ASGA Supports Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year.

##### **Option B: F Threshold Triggers**

**ASGA Supports Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

##### **Option C: F Target Triggers**

**ASGA Supports Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

Tier 2: Spawning Stock Biomass (SSB) Triggers

##### **Option A: Deadline to Implement a Rebuilding Plan**

**ASGA Supports Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

### **Option B: SSB Threshold Trigger**

**ASGA Supports Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

### **Option C: SSB Target Trigger**

**ASGA Supports Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

Tier 3: Recruitment Triggers

### **Option A: Recruitment Trigger Definition**

**ASGA Supports Sub-option A2:** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

### **Option B: Management Response to Recruitment Trigger**

**ASGA Supports Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

Tier 4: Deferred Management Action

### **ASGA Supports Option A (status quo): No Deferred Management Action.**

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

## **4.2.2 Measures to Address Recreational Release Mortality**

### **Option C. Additional Gear Restrictions**

**ASGA Supports Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**ASGA Supports Sub-option C2:** Striped bass caught on any unapproved method of

take would be returned to the water immediately without unnecessary injury.

#### **Option D. Outreach and Education**

**ASGA Supports Sub-option D2:** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

### **4.4 Rebuilding Plan**

#### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

**ASGA Supports Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

#### **4.4.2 Rebuilding Plan Framework**

**ASGA Supports Option B:** 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 recruitment assumption specified in Amendment 7) 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.

### **4.6.2 Management Program Equivalency (Conservation Equivalency)**

#### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

**ASGA Supports Sub-option B1-a:** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

#### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

**ASGA Supports Sub-option C3:** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

#### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

**ASGA Supports Sub-option D2:** Proposed CE programs for non-quota managed



fisheries would be required to include an uncertainty buffer of 25%.

**Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

**ASGA Supports Sub-option E2:** the percent reduction/liberalization projected for the FMP standard at the state-specific level.

**From:** [Marcin Romanczyk](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment 7  
**Date:** Friday, April 15, 2022 10:43:24 PM

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To Whom it may concern,

I am an avid striper fisherman who just got into the sport a mere 5 years ago. Since then I have saturated my mind with learning about striped bass, fishing for them and promoting this fishery to my friends and family. It has completely and utterly changed my life and I cherish every memory I have made on the water chasing these animals. Since 2017 I have personally harvested a total of 5 striped bass and released hundreds of these healthy and hearty fish, only to learn along the way how in trouble these fish are. And how spoiled previous generations were with the sizes and quantities of these animals from stories I've read or listened to. Its no surprise to me that human greed rears its ugly teeth in every single avenue of life, from health care to recreational fishing. But at some point, at some corner undeniable data needs to be considered and processed by humans who care about the environment, about our species, our planet and our future generations or else we are all no better than Vladimir Putin. Please save the striped bass from mindless pillaging and over harvestation. Thank you.

--

**Marcin Romanczyk DPM, AACFAS**  
Board Certified Podiatrist

[LongIslandSolePodiatry@gmail.com](mailto:LongIslandSolePodiatry@gmail.com)



**From:** [Ben Hahn](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 10:42:50 PM

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To Whom It May Concern:

I am commenting to show my support for the Draft Amendment 7. I am a fly fishing guide in Montana and have seen management strategies work out here although we still have a long way to go.

I took a guided fly fishing trip for striped bass last year while visiting my wife's family in Long Island and was totally amazed at these beautiful fish. While talking to the guide, he explained that numbers were way down and that the future looked grim if we didn't do something. I left that trip hoping the powers to be would do the right thing. So please do the right thing and pass draft amendment 7 so that these amazing fish have a future.

- Ben Hahn

Sent from my iPhone

**From:** [Andre Hannon-Gonzalez](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 10:39:33 PM

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To whom it may concern,

To be straight forward, I am a novice in industry. However, I was very curious when I heard about the extreme over fishing of striped bass. I am well aware of the atrocities that happens in commercial fishing around the world but to hear about stripers hit a little closer to home as a “north-easterner”.

This comment may fall on deaf ears but I firmly believe as a hunter and angler we will fight for conservation more than anyone. Wether I fish the mouth of the Thames in Connecticut or fish the Long Island Sound I hope to continue to do so with my son and future grandchildren

It is evident that we all care about the well being of stripers and their future. It is up to us to make sure that our future generations can enjoy this sport. It is time to protect this species even more and we will accomplish that goal by fighting together.

As I’ve preciously said, I’m an rookie in this sport but I’ve already seen the diminishing affects that have been happening.

Thank you for listening to my rant and let’s safe these fish!

Sincerely,

AJ Hannon  
Sent from my iPhone

**From:** [Jack Hawley](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 10:36:54 PM

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To whom it may concern:

For the last ten years, I have spent an indescribable amount of time, energy, and money fishing for striped bass in the state of New York. Being born in the early 2000s, I have never experienced a healthy or abundant fishery and fear that because of poor leadership and decision-making, my future children may never themselves. That said, there is hope and now we finally have a chance to not only let the future fisherman of our world experience the thrill of striped bass fishing but can restore a vital element of our ocean's ecosystem.

I support the following legislation (in order):

**4.1 Management Triggers**

*Tier 1-Fishing Mortality Management Triggers*

Option A1

Option B1

Option C1

*Tier 2-Female SSB Management Triggers*

Option A2

Option B1

Option C1

*Tier 3-Recruitment Triggers*

Option A3

Option B2

*Tier 4-Deferred Management Action*

Option A

**4.2.2 Recreational Release Mortality**

Option A

Option C1

Option C2

Option D1

**4.4.1 Rebuilding Plan**

Option B

**4.4.2 Rebuilding Plan Framework**

Option B

#### **4.6.2 Management Program Equivalency**

Sub-Option B1a

Sub-Option B1c

Sub-Option B2b

Sub-Option C3

Sub-Option D3

Sub-Option E2

**From:** [Patrick Hilbert](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 10:34:28 PM

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Better business through conservation! Keep this stock high. I am 29 and caught more bass as a 12 year older novice than I do now , as a tangible show of where things are from where they were. We must keep the stocks high and thereby not change the threshold! Thank you.

- Patrick Hilbert

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Patrick Hilbert  
Outdoors East  
(m): 516-528-7172

**From:** [Charlie Bischoff](#)  
**To:** [Comments](#)  
**Cc:** [indeepoutdoorsmedia@gmail.com](mailto:indeepoutdoorsmedia@gmail.com); [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7- Striped Bass comments  
**Date:** Friday, April 15, 2022 10:34:02 PM

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Hello,

I am commenting on the proposed striped bass Amendment 7.

My name is Charlie Bischoff and I am from the state of Massachusetts, currently residing in California. I am a lifelong surfcaster and fly fisherman deeply dedicated to the catch-and-release pursuit of striped bass along the New England coast. It's a passion that I learned from a young age from my father, who learned from his father. I am writing to you in hopes that you will protect this incredible and valuable species so that my children can also enjoy the same fishery that has literally shaped me into the person I am today. It is my firm belief (and the belief of every single angler that I know) that striped bass are worth more alive than harvested, due to their widespread and fanatic recreational value. Before I comment on the individual pieces of the proposed Amendment 7, I would like to make a few general comments and recommendations. **I have put my specific comments to the individual questions/tiers related to Amendment 7 in a simple list** for ease of data collection by the administrative staff. However, I have more comments below that I believe are important.

Briefly, here are my choices

#### **4.1**

##### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

##### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

##### **Tier 3**

Option A- Support A3

Option B- Support B2

##### **Tier 4**



Support A

## 4.2

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D1

### 4.4.1

Support B

### 4.4.2

Support B

### 4.6.2

Option B- Support B1-a

Option C- Support C3

Option D- Support D3

Option E- Support E2

#### **I also have several other comments I would like to make:**

· The public information document for Amendment 7 was very complex and I believe it dissuaded public engagement. It was far too long, with too much jargon and unnecessary details. I know, for a fact, that this prevented people from engaging in the process, or submitting comments- it was too much time and effort to even read the document, let alone understand all the nuance and details, and then comment on all the choices. **In the future, at minimum there should be some kind of summary document that is short enough for the average citizen to read in less than 15-minutes, which can be understood by everyone.**

· The ASMFC has stated that the public is losing faith in their ability to make swift, critical decisions based on science and public input. **Please, act fast and in accordance with science and the majority's wishes:** do not delay or we will lose this fishery forever.

· This is a critical moment for the striped bass, and we all- including the commission- know it. **Please, consider managing the striped bass for abundance and not for yield** when making your decisions. Note that the striped bass fishery is almost

entirely a recreational, catch and release, fishery, and that is where the largest portion of the GDP generated by the fishery comes from. The good news is, **the more fish in the ocean, the better it is for everyone: the fish, the economy, and the citizen angler..**

· In the past, the ASMFC has adopted measures with low statistical chances of being successful, over very long timelines. I believe this is the wrong way to manage this fishery. **We need better management and more aggressive measures that have a higher likelihood of protecting the fishery, and rebuilding and responding more quickly.** I am in support of management that favors keeping “too many” fish in the ocean, and responding to low spawning years and increased effort on a year-by-year basis.

· I am in total opposition to any measure that would decrease the benchmarks the fishery is managed by. **That is, we should not be lowering or shifting baselines. We have managed the population well in the past, and should never consider decreasing our population targets** (SSB thresholds and triggers). A sliding baseline is unacceptable and will be the demise of this fishery!

**Above all else, I ask that the ASMFC act quickly, decisively, and with abundance- not yield- at the forefront of their striped bass management decisions. We must rebuild this fishery in less than 10-years, and at all costs, and that requires immediate and aggressive action from the commission.**

Thank you for the opportunity to comment, and hope that my voice will be heard, and we can save this important and beloved fishery.

Sincerely

Charlie Bischoff  
973-255-0267

Sent from my iPhone

**From:** [Dan Buckley](#)  
**To:** [Comments](#)  
**Cc:** [Dan Mckiernan](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 10:31:16 PM

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Hello,

Striped bass fishing has held my family together for decades. Through good and bad, we can always count on striped bass fishing to bring everyone together. In recent years it has been hard watching the resource decline after once being a success story of recovery and abundance.

It is so saddening to see the spawning stock biomass at a 25 year low. The three most recent young-of-year indices for the upper Chesapeake Bay being very low further highlights this dire situation. I believe it is of utmost importance to **take actions now** that manage the fishery for abundance and protect the robust 2015 class from excessive harvest.

Regarding Amendment 7, the Management Triggers are of concern. I support maintaining the existing spawning stock biomass and fishing mortality triggers contained in the striped bass management plan. For *4.1 Management Triggers > Tier 1: Fishing Mortality (F) Triggers*, I support Sub-Option A1 (status quo): Reduce F to a level that is at or below the target within one year. Given that the board learned the stock was experiencing overfishing in April 2019, we cannot continue to delay taking actions to reduce overfishing.

Given that it has now been three years since the Board learned the stock was experiencing overfishing, I am concerned over the progress towards the fishery management plans' requirement to rebuild the stock within 10 years. For Tier 2: Spawning Stock Biomass Triggers, I support Sub-option A2 in favor of a two-year deadline for implementing a rebuilding plan.

Striped bass are the core of the east coast fishing community. There are countless guides, shops, and tourism dollars dependent on the abundance of striped bass. I want and hope that future generations have an abundant resource of striped bass to bring families together.

Your time and consideration is much appreciated.

Thanks,

Dan Buckley  
12 Willard Ave  
Medford, MA 02155

**From:** [Joey Sikorski](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 10:30:29 PM

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Hi,

I'm writing in as a concerned angler as well as a manager of a small business where the striped bass population directly effects my business. I'll keep my response to this simple and hope it gets read by someone.

We all know that there has been a decline in the striped bass population. I've seen it through my store and as an avid fly fishermen. I've seen the rise and fall as I've grown up in Maryland since I was 4 years old. Now, as I'm 32, I'm not even sure my kids will get to enjoy what once was.

We need a better way to manage and rebuild this amazing species so that it can be enjoyed for generations to come. We need a better structure for recreational anglers to reduce mortality. I love catch and release, and I try to educate as many folks as possible on safe practices for this. A system where all recreational anglers can learn and practice is key. Some folks don't realize the importance of what damage can be done and how it can further hurt the population. This can be a quick mandatory online system once a year. It can be limiting what gear can be used.

I've been running a kayak shop for years. I see the ebbs and flows of our business as the fisheries change. The number one population to do that for us is striped bass. I've seen a huge transition from customers who were die hard striper bass fishermen, to now just finding something else. When numbers were much better for this species, we always did great to get folks out on the water. As this has dropped, so has our business. I don't want a short fix for this, I want a long term solution. I enjoy getting folks out on the water fishing for striper bass and want to see it come back around again.

A proper rebuilding plan right now is more important than ever before. If nothing changes and we stay this course, the next generation will never get to enjoy what once was. I stand with the ASGA's position to address and help rebuild the striped bass population. It needs to be done, not for us but for our future generations.

[Joseph Sikorski](#)  
**Patuxent Adventure Center**  
**General Manager**  
**410-394-2770**  
[www.facebook.com/patuxentadventurecenter](http://www.facebook.com/patuxentadventurecenter)

**From:** [Ned B](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 10:28:58 PM

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ASMFC,

I am writing a personal comment in support of conservative conservation measures to protect Striped Bass. I grew up in tidewater Virginia and started striper fishing in the post-moratorium 1990s. Those cold fall mornings are some of my favorite fishing memories. It felt like the big fish were plentiful and the stocks had rebounded. Now I live in the Boston area and have the pleasure of catching stripers on warmer days. Unfortunately management measures since the moratorium have not protected the Striped Bass and those big fish are no longer nearly as plentiful.

We have a great stock of schoolie sized bass and we must take conservative steps to ensure their future. I am not advocating a total moratorium as many guides, tackle shops, hotels, restaurants and more local businesses rely on striper anglers. But I am in support of conservative management triggers and quick action on those triggers. Steps also need to be taken to implement safe handling and release methods for all anglers. Anglers need to be able to enjoy catching striped bass, but should also be accountable for ensuring their post-release mortality.

Thank you for your time and consideration. With your help I have faith that the Striped Bass will not only remain for my fellow anglers and I to enjoy, but also for my young daughter and her generation.

Ned Burgwyn

**From:** [Thomas Kirk](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 10:28:45 PM

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My name is Tom Kirk and I'm a resident of New Jersey. I've been fishing for striped bass for over 20 years. Surf fishing is my passion and the striped bass are the staple of the surf in New Jersey. I want to make sure that my kids have the same opportunity to catch these amazing fish as I did. There needs to be improvements in the regulations to ensure that they are around for future generations.

I support  
4.1  
Tier 1

Option A - support A1

Option B - support B1

Option C - support C1

I support  
4.2.2

Option A

Option B2

Option C

Option D

I also believe the NJ Striped Bass Bonus Program needs to be ended during these uncertain times for the striped bass.

Thank you for the opportunity to comment,  
Tom Kirk

**From:** [Noelle Theriault](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 Comments  
**Date:** Friday, April 15, 2022 10:28:38 PM

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To whom it may concern:

Hello, I am a recreational angler in Kittery, Maine and would like to voice my opinions on the draft amendment 7.

Below are my comments as they relate to the amendment:

#### 4.1 Management Triggers

##### Tier 1: Fishing Mortality (F) Triggers

###### Option A: Timeline to Reduce F to the Target

I am in favor of sub-option A1 (status quo): Reduce F to a level that is at or below the target within one year.

###### Option B: F Threshold Triggers

I am in favor of Sub-option B1 (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

###### Option C: F Target Triggers

I am in favor of Sub-option C1 (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

##### Tier 2: Spawning Stock Biomass (SSB) Triggers

###### Option A: Deadline to Implement a Rebuilding Plan

I am in favor of Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

###### Option B: SSB Threshold Trigger

I am in favor of Sub-option B1 (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

###### Option C: SSB Target Trigger

I am in favor of Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

### Tier 3: Recruitment Triggers

#### Option A: Recruitment Trigger Definition

I am in favor of Sub-option A2: The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

#### Option B: Management Response to Recruitment Trigger

I am in favor of Sub-option B2. If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

### Tier 4: Deferred Management Action

I am in favor of Option A (status quo): No Deferred Management Action.

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger

## 4.2.2 Measures to Address Recreational Release Mortality

### Option C. Additional Gear Restrictions

I am in favor of Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

I am in favor of Sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

### Option D. Outreach and Education

I am in favor of Sub-option D2: It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

## 4.4 Rebuilding Plan



#### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

I am in favor of Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

#### **4.4.2 Rebuilding Plan Framework**

I am in favor of Option B: 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 recruitment assumption specified in Amendment 7) 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.

#### **4.6.2 Management Program Equivalency (Conservation Equivalency)**

##### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

I am in favor of Sub-option B1-a: CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

##### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

I am in favor of Sub-option C3: CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

##### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

I am in favor of Sub-option D2: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

##### **Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

I am in favor of Sub-option E2: the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Thank you,

Noelle Theriault

**From:** [Gregg Beldock](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 10:28:02 PM

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To Whom it May Concern:

I implore the Department of Fisheries and State agencies to adopt the recommendations of The Teddy Roosevelt Foundation.

Circle hooks...education...keep fish in the water....

Gregg Beldock

Sent from my Verizon, Samsung Galaxy smartphone  
Get [Outlook for Android](#)

**From:** [247Lures Elliot Thomas](#)  
**To:** [Comments](#); [WILLIAM HYATT](#); [Sen. Craig A. Miner](#); [ROBERT LAFRANCE](#); [Rep. Melissa Ziobron](#); [Justin Davis](#)  
**Subject:** [External] Amendment 7 Public Comment from an angler and lure builder  
**Date:** Friday, April 15, 2022 10:26:31 PM

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Dear Atlantic Striped Bass Management Board, Commissioner Hyatt, Senator Miner, Robert LaFrance, Representative Ziobron, and Assistant Director Davis,

Good Evening and thank you for taking a few minutes to read my email. My name is Elliot Thomas and with my wife Lauren I own and operate 247 Fishing, LLC in Berlin, CT. We make wooden fishing lures in small batches that we turn, paint, epoxy, rig, and package to be fished all around the North East and beyond. Our lures have caught Mahi Mahi, Barracuda, Little Tunny, Largemouth Bass, Pike, and Bonito, but they are primarily designed for Striped Bass and Bluefish.

I've spent the past five-plus years building this business from a mere weekend hobby into a nearly full-time job. I've had the opportunity during that same time to speak with anglers of all shapes, sizes, ages, and walks of life. From 8 year old kids that are just getting into fishing, to salty and seasoned anglers that have hours of stories to share. While visiting stores, attending shows, and holding demonstrations I believe I've heard a wide variety of accounts and opinions on the striped bass population and I'd like to share some of my own with you.

Growing up in Pennsylvania my father never taught me about stripers. The jersey shoreline was at least two hours away and the shad run was the most exciting migratory fish we ever thought about targeting. It wasn't until college when I spent a few years living on the Eastern Shore of Maryland did I learn about fishing for "rockfish" in the upper Chesapeake. The lodge where I spent a lot of time had quite the library, including an old book on fly fishing saltwater by Lefty Kreh. When I decided I wanted to learn to fly fish for rockfish, I came across Lefty's book in my research.

The entirety of information on striped bass was one paragraph. And while I'm paraphrasing here, it basically summed up to 'the striped bass fishery is in such bad shape that they aren't worth fishing for, and I hope they do something about the regulations to save the species'. Obviously that was written many years ago when the striped bass populations were at a very low point. But with some significant changes, the species made a rebound. But I think we all recognize they're on the decline again.

As a father, angler, lure builder, fishing guide, outdoorsman, and environmentalist, I beg you to act now. If strong and significant actions are not taken now, the collapse could be enormous. Without stripers to target, charter captains will be out of work, tackle shops will suffer in sales, lure builders like myself might be out of business, rod builders will struggle, outdoor shows will lose both vendors and attendees, kids will have to find something else to excite them, and the list goes on and on. These effects will take their toll on our economy from the top to the bottom.

Please, vote as if this is your last chance to save the species, the fishery, and a large portion of the fishing industry in our region. My recommendations/preferences are as follows...

4.1

Tier 1

Option A- Support A1

Option B- Support B1

Option C- Support C1

Tier 2

Option A- Support A2

Option B- Support B1

Option C- Support C1

Tier 3

Option A- Support A2

Option B- Support B2

Tier 4

Support A

4.2

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Option B- Support B1-a

Option C- Support C3

Option D- Support D2

Option E- Support E2

I waited this long until the last day to send my comment for a few reasons. Primarily because I really wanted to be sure of my recommendations. But also because I wasn't going to simply copy and paste someone else's letter. I've always considered myself a fairly intelligent person (National Honor Society throughout High School, Provost Scholarship in college, Bachelor of Science in Environmental Science from Elizabethtown College, and several Master's level courses in field biology) I find it **APPALLING** at how verbose and difficult to read this entire Amendment 7 process has been.

I think whomever put together this 149 page Draft Document should be ashamed of themselves. It seems to me as if it was written with the specific intent of deterring public comment by making it so long and confusing no one would read it. These documents should be written concisely and clearly so that everyone involved in the industry has the ability to read, understand, and offer opinions.

Thank you for your time and consideration, I would be happy to speak to any of you personally if given the opportunity.

Tight Lines!

Elliot Thomas

Owner

247 Lures (247 Fishing, LLC)

484.225.5887

[www.247Lures.com](http://www.247Lures.com)

**From:** [Kerry Heffernan](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 10:17:07 PM

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Please be advised that myself and dozens of other Chefs with whom i have been in contact with, feel very strongly that Striped Bass are in big trouble and need all the help your Council can provide in protecting them in preventing a critical loss in their stock , especially those harvested during the spawning periods

We as a group have decided to remove them from any menus as a further measure

Thank you very much for for your consideration

Chef Kerry Heffernan

Crew Restaurant Group

Grand Banks

Pilot Brooklyn

Holy Water

Island Oyster

Drift In

Sent from my iPhone

**From:** [Rui Coelho](#)  
**To:** [Comments](#)  
**Subject:** [External] Subject: Draft Amendment 7  
**Date:** Friday, April 15, 2022 10:05:38 PM

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Dear **Atlantic States Marine Fisheries Commission** ,

I am a resident of Belmont Mass and currently serving as the president of the Greater Boston Chapter of Trout Unlimited that represents nearly 1,000 members in our region. While our TU mission is focused on cold water stream protection (trout and salmon), many of us in the region find our “tug” along the Mass shoreline for stripers and have seen the fishery decline over the years. Personally I have been fishing for stripers since the mid-1970s. I have seen the ebbs and flows to the population, and it is obvious we are in a seriously deteriorating situation. Please listen to the many voices and make the right choices to ensure the population recovery and sustainability.

Please find my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment, below.

#### 4.1 Management Triggers

##### TIER 1 OPTIONS: Fishing Mortality (F) Triggers

– Option A: Timeline to Reduce F to the Target – support Sub-option A1 (status quo): Reduce F to a level that is at or below the target within one year.

–Option B: F Threshold Triggers – support Sub-option B1 (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

–Option C: F Target Triggers – support Sub-option C1 (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

##### TIER 2 OPTIONS: Female Spawning Stock Biomass (SSB) Management Triggers

–Option A: Deadline to Implement a Rebuilding Plan – support Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment.

–Option B: SSB Threshold Trigger – support Sub-option B1 (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

–Option C: SSB Target Trigger – support Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

##### TIER 3 OPTIONS: Recruitment Triggers

–Option A: Recruitment Trigger Definition – support Sub-option A3: The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model (NY, NJ, MD, VA) shows an index value that is below the median of all values in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

–Option B: Management Response to Recruitment Trigger – support Sub-option B2. If the recruitment trigger is

tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

#### TIER 4 OPTIONS: Deferred Management Action

- support Option A (status quo): No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

#### 4.2 Recreational Fishery Management Measures

##### Option B. Effort Controls (Seasonal Closures)

- support Sub-option B2. Spawning Area Closures: The Board can select either or both of the following sub-options B2-a and B2-b. Multiple states currently have spawning closures in place with closure boundaries defined by those states.

- support Sub-option B2-b. No-Targeting Spawning Closure Required: All recreational targeting of striped bass would be prohibited for a minimum two-week period on all spawning grounds (not necessarily the entire spawning area) during Wave 2 (March-April) or Wave 3 (May-June), as determined by states to align with peak spawning.

##### Option C. Additional Gear Restrictions

- support Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

- support Sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

##### Option D. Outreach and Education

- support Sub-option D1: States would be required to promote best striped bass handling and release practices by developing public education and outreach campaigns. States must provide updates on public education and outreach efforts in annual state compliance reports.

#### 4.4 REBUILDING PLAN

##### 4.4.1 Recruitment Assumption for Rebuilding Calculation

- support Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

##### 4.4.2 Rebuilding Plan Framework

- support Option B: 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 recruitment assumption specified in Amendment 7) 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.

#### 4.6 ALTERNATIVE STATE MANAGEMENT REGIMES

##### 4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option B. Restrict the Use of Conservation Equivalency Based on Stock Status

- support Sub-option B1. Restrictions: CE programs would not be approved when Sub-option B1-a: the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.



4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals

-support Sub-option C3: CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30.

4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries

- support Sub-option D3: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 50%.

4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries

- support Sub-option E2: Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Sincerely,

Rui Coelho

Belmont, MA

**From:** [Davidson Norris](#)  
**To:** [Comments](#)  
**Cc:** [Emerson Hasbrouck](#); [Maureen Davidson](#); [James Gilmore](#); [CAROL HOFFMAN](#); [Sen. TODD KAMINSKY](#); [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 10:04:59 PM

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The following are my comments regarding Draft Amendment 7. I have been kayak fly casting for stripers in Jamaica Bay for over 20 years. Keep them abundant, healthy and sustainably reproductive.

Tier 1 fishing mortality (F) triggers  
I support Sub-option A1 (status quo)  
I support Sub Option B1 (status quo)  
I support Sub-Option C1 (status quo)

Tier 2: spawning stock (SSB) biomass triggers  
I support Sub-option B1 (status quo)  
I support Sub Option B1 (status quo)  
I support Sub-Option C1

Tier 3: recruitment triggers  
I support Sub-option A2  
I support Sub Option B2

Tier 4: deferred management plan  
I support Sub-option A (status quo)

Option C Additional gear restrictions  
I support sub option C1  
I support sub option C2

D. Outreach and Education  
I support sub option D2

Davidson Norris, Principal  
Carpenter Norris Consulting, Inc  
ph:212 431 6821 f:212 431 4425  
[david.norris@carpenternorris.com](mailto:david.norris@carpenternorris.com)  
[www.carpenternorris.com](http://www.carpenternorris.com)

Adjunct Associate Professor of Sustainable Design  
Columbia University School of Architecture

From: [Toby Frey](#)  
To: [Comments](#)  
Subject: [External] ASMFC ADmendment 7  
Date: Friday, April 15, 2022 10:04:32 PM

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## ASMFC

### Members

Ref: Amendment 7

Dear Members,

I'm in my 70's and have been fishing on the Chesapeake Bay since I was 8. I've seen a lot of come & go's, clean water, dirty water and worse water. I have seen some management, few episodes of good decisions and now we are in a period of 20+ years of decline with no real affirmative action on the part of Federal or State agencies.

As a result of the Moratorium of 85-89, I raised Striped Bass in Salt Water in Dorchester County Maryland from 1989-1993, producing over 200,000# a year. In 1992, MD approved our Farm to raise pure striped bass, not hybrid...We had a permit to harvest 6 females and 10 males if I recall correctly (which we released live in the Nanticoke River after breeding)...We tried to get females in the low 30"s as they were the most successful producing fry...We had 2 yrs of the most successful record of Striped Bass fingerlings released for Delmarva Power Mitigation program during our tenure there.

So much for my qualifications to submit comment

Amendment 7...

I'd like to see a Coast wide Slot of 30" or less (over 32" 90% female)

No Trophy Season I have never understood why with a declining population we continue to harvest the breeding stock.

Catch & Release Jan-Mar...Barbless hooks

Chesapeake Bay~ Closure Jul-Aug (Reduce floaters~ High water temps)

Season opens Jun 1 Chesapeake Bay No target Apr, May

No live lining for recreational fisherman (logic: commercial goes out gets quota/limit and quits ~ recreational fisherman buys 75 spot,

doesn't stop till spot/bait is gone) Less floaters/mortality

Other considerations to limit catch

Restrict # of lines off a boat (6)

No bonus fish for Charter/Guides

Mandatory reporting for all anglers, daily (need better harvest info  
- MRIP is flawed) No reporting, No License

Fund a system to record daily harvest

Members of the ASMFC and State Agencies have been failing to achieve their goals for 20years. Amendment 6 allowed ASMFC to manage Striped Bass, they just failed to do so...Hoping there is change in the wind..

<\*))))))>{

Toby Frey

103 Third St.

Oxford, MD 21654

410-725-1781

Coastal Conservation Assoc. MD Board Member

MD Tidal Coastal & Recreational Fisheries Committee

MD Sport Fishing Advisory Commission

Mid Shore Fishing Club

Salt Strong Insider

Secret Dove Club

**From:** [Adam Wiles-Rosell](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 9:59:09 PM

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To whom it may concern,

Striped bass are the fish of the people. They are accessible for so many individuals up and down the East Coast. Stripers, rockfish, striped bass, whatever you would like to call them, they are my favorite species to fish for and release. Unfortunately, the numbers do not lie and the species are in complete despair.

The sad thing here is that history has shown us this before. How many times must repeat our bad habits? How many times must we trip over a nickel to pick up a penny?

If we do nothing now - there will be nothing left. Our kids deserve to be able to catch striped bass in abundance for decades to come.

Not only will current generations and generations to come suffer, but businesses will suffer as well. Without striped bass folks will have less of a reason to shop at their local fly shops. Vacations will not get booked and eco tourism will suffer. Guided trips will be booked less frequently. These fish are worth more swimming than they are on the table. Seeing how these fish get treated by some States is appalling, left in gill nets to die, big breeding fish being harvested...it is not sustainable and it is shortsighted for the future.

My voice is not loud enough to make a difference but I hope that collectively my fellow anglers are able to make a difference and save the most iconic fish on the East Coast. No action is inexcusable and striking action is needed now.

Appreciatively,  
Adam Wiles-Rosell

**From:** [TIM DRUMMEY](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 9:58:12 PM

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Hi,

Thanks for the opportunity to have a small voice in a species I am passionate about and concerned for its future. My name is Tim Drummey and I am a recreational fisherman. I was primarily a freshwater fisherman until 5 years ago when I caught my first striper. Since then not a weekend goes by when I'm not traveling a couple hours every Saturday and Sunday morning well before Sunday up to hopefully catch a striper. In those five years I've gone from consistently catching large numbers of stripers to just enjoying the scenery without catching a fish. I don't believe in harvesting stripers out of respect for them and the blatant disregard for them as I've seen people stack them up on the shore.

I believe all fish over 26" should be protected and the slot if allowed 22-26 and 1 fish recreational and 3 commercial until the stock has rebounded. Ideally there be a complete moratorium on harvesting any and all stripers. I hope and pray I have the opportunity someday to take my grandkids striper fishing without having to say "I remember when". Thank you for taking the time to read my email and I pray that you have the strength to make the tough but right decisions!

Sent from my iPhone

**From:** [Ramon Reyes Jr](#)  
**To:** [Comments](#)  
**Subject:** [External] Comment for Amendment 7  
**Date:** Friday, April 15, 2022 9:56:58 PM

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My name is Ramon Reyes jr and I am an avid surfcaster from the state of New Jersey. The striped bass fishery has been a part of my life so far back that I can't recall when I began to learn about fishing. However, I can attest that the striped bass fishery has allowed me to be build a supportive friendships a hobby that I can resort to that brings me back to nature, and learn more about the significant impact that the lack of regulation on striped bass fishery can have in the long run if this is not addressed now. Striped bass fishery in the impact of to this species and its ecosystem needs to be place at the forefront, we need to understand that placing monetary gains first will only continue to result in an uncertain for this species and the ecosystem they are a part of. We are already in a predicament and should act now to approach this from a preventative angle rather than trying to clean up something that can be irreversible. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2  
Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Ramon Reyes jr  
Pleasantville, New Jersey  
Email: [ramonreyesa87@gmail.com](mailto:ramonreyesa87@gmail.com)



**From:** [Scott Sandlin](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Striped Bass Amendment 7  
**Date:** Friday, April 15, 2022 9:56:23 PM

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Dear Atlantic States Marine Fisheries Commission,

I simply wanted to advise you of my support for the striped bass amendment 7. My position is to support this amendment to sustain a lifelong passion for striped bass fishing. The unique component of my support is that I actually live in Tennessee. We have spent many years traveling to areas up the east coast of this great country striped bass fishing. We have been blessed to be able to enjoy this hobby over the years.

Interestingly, while we have caught hundreds of striped bases we have never harvested the first fish. We do it for the love of the species and look forward to this for many years to come. I imagine the tourism folks in my home state would prefer our dollars to stay local, however, you have an amazing resource that lures us north year after year.

Please consider supporting amendment 7. Thank you for your consideration and all that you do for our great American fisheries.

Scott Sandlin

7065323691 office  
7062181238 mobile

**From:** [Cody Rubner](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 - Striped Bass  
**Date:** Friday, April 15, 2022 9:48:38 PM

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Ms. Franke & the ASMFC Atlantic Striped Bass Management Board,

Here we are amidst arguably the most crucial moment for the future of our Atlantic striped bass fishery in three decades. These striped fish swim close to my heart. Long nights catching schoolie stripers off the beaches and jetties of Cape Cod with my father sparked a lifelong pursuit to explore, understand and protect our oceans.

They are the reason I obtained my degree in Marine Science and Fisheries.

They are the reason I became a fishing guide.

They are the reason that I return to the Cape every spring with my family.

This board will decide the future of this fishery. You have the opportunity to continue to fight to revive a degrading fishery by trusting the data showing its downfall. Or, you will singlehandedly be at fault for its demise.

Somewhere along the way in reading thousands of comments, monitoring social media upheaval, fielding calls from lobbying groups and reviewing research that should directly drive your decision making, I implore you to take a step back and think about the sheer diversity of backgrounds and intentions speaking on behalf of striped bass. Some want to eat them. Some want to sell them. Some want to fool them with feathers. Some sit on rocks under darkness awaiting their presence. Most just desire a brief moment and a photo. Amongst this variety there is a singular common denominator: they ALL need FISH in the water.

MANAGE FOR ABUNDANCE so that all may have ACCESS and QUALITY.

The complete and total destruction of one of the most culturally iconic fisheries on the east coast rests on your shoulders. No pressure...

Below you will find the options I support and strongly advocate for Amendment 7 for Striped Bass:

### **Tier 1: Fishing Mortality (F) Triggers**

Option A: Timeline to Reduce F to the Target

*Preferred Alternative—**Sub-option A1** (status quo): Reduce F to a level that is at or below the target within one year.*

Option B: F Threshold Triggers

*Preferred Alternative—**Sub-option B1** (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.*

## Option C: F Target Triggers

*Preferred Alternative—**Sub-option C1 (status quo):** If  $F$  exceeds the  $F$  target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce  $F$  to a level that is at or below the target within the timeframe selected under sub-option A.*

## Tier 2: Spawning Stock Biomass (SSB) Triggers

### Option A: Deadline to Implement a Rebuilding Plan

*Preferred Alternative—**Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment.*

### Option B: SSB Threshold Trigger

*Preferred Alternative—**Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].*

### Option C: SSB Target Trigger

*Preferred Alternative—**Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].*

## Tier 3: Recruitment Triggers

### Option A: Recruitment Trigger Definition

*Preferred Alternative—**Sub-Option A2:** The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA) shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years. The high recruitment reference period used for this trigger may be adjusted as recommended by the TC during benchmark stock assessments. This trigger alternative has a moderate sensitivity; it is more sensitive than the status quo but less sensitive than sub-option A3.*

### Option B: Management Response to Recruitment Trigger

*Preferred Alternative—**Sub-option B2:** If the recruitment trigger is tripped, an interim  $F$  target calculated using the low recruitment assumption is implemented, and if  $F$  from the terminal year of the most recent stock assessment is above the interim  $F$  target, the striped bass management program must be adjusted to reduce  $F$  to the interim  $F$  target within one year.*

## Tier 4: Deferred Management Action

*Preferred Alternative—Option A (status quo): No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.*

#### **4.2.2 Measures to Address Recreational Release Mortality**

**Option B. Effort Controls (Seasonal Closures)** - Do not support the inclusion of seasonal closures.

#### **Option C. Additional Gear Restrictions**

*Preferred Alternative—Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.*

#### **Option D. Outreach and Education**

*Preferred Alternative—Sub-option D2: It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns.*

### **4.4 Rebuilding Plan**

#### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

*Preferred Alternative—Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.*

#### **4.4.2 Rebuilding Plan Framework**

*Preferred Alternative—Option B: 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 recruitment assumption specified in Amendment 7) 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.*

### **4.6.2 Management Program Equivalency**

#### **Option B. Restrict the Use of Conservation Equivalency Based on Stock Status**

*Preferred Alternative—Sub-option B1-a: CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.*

#### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

*Preferred Alternative—Sub-option C3: CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30.*

#### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed**

## **Fisheries**

*Preferred Alternative—Sub-option D2: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.*

### **Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

*Preferred Alternative—Sub-option E2: Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state-specific level.*

*Best,*

*Capt. Cody Rubner*

**From:** [Sean Dorsey](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 9:45:17 PM

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Dear ASMFC,

My name is Sean Dorsey and I am from the state of Massachusetts. Striped bass are important to me because recreational striper fishing is something I am extremely passionate about. Without a healthy fishery I am afraid that my children and further generations will not have the opportunity to engage in the sport I love so much. Fishing for striped bass has a long history throughout the entire northeast coast, and in order for that to continue, conservation must be the number one priority. The striped bass population has suffered greatly in the past couple decades and something must be done about it now.

Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Sean Dorsey

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Spencer, MA

Email: [s.dorsey1989@gmail.com](mailto:s.dorsey1989@gmail.com)

**From:** [Bob McDowell](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 9:43:56 PM

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ASMFC Board Members,

I have been fishing for over fifty years. The bass population went from so so (probably because I was new to the sport) to poor, then due to a moratorium the fish population exploded and the fishing got incredible and now the Striped Bass fishing has been declining for the last five to ten years. This fishery needs to be saved for future generations.

**To save the Striped Bass fishery I recommend suspending Conservation Equivalence until the fish stock is above the threshold.**

This fishery was saved once before, let's save it again!

Thank you for your time,

Robert G. McDowell  
680 North Clinton Avenue  
Lindenhurst, NY 11757

Sent from Bob's iPad



**From:** [Richard Kuhlman](#)  
**To:** [Comments](#)  
**Subject:** [External] Comments Draft Amendment 7  
**Date:** Friday, April 15, 2022 9:43:48 PM

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As a retired recreational fisherman, I offer these comments to Draft Amendment 7, to the Striped Bass Fishery Management Plan.

First off, I am a catch and release fisherman. As part of my responsibilities, I do my best to release any Striped Bass I catch with minimal harm. To accomplish this, I have stopped chumming and live lining for Striped Bass. Even with circle hooks, too many undersized fish are harmed. Especially in the summer when air and water temperatures are high. I always fish artificials with the treble hooks replaced with single inline hooks.

I also return the fish back into the water as quickly as possible with minimal handling. I do all of this because I am mostly concerned about Striped Bass recreational mortality. While ASMFE reports that over 50% of the recreational harvest is caused by release mortality, I do not read much attention paid to the issue in Amendment 7. Without first getting a handle on the causes of recreational release mortality, and redesigning the management plan to address release mortality, any efforts to rebuild the stock will have limited success.

My specific comments on Draft Amendment 7 are:

To structure Amendment 7 to achieve Maximum Abundance and not Maximum Yield. Maximum Yield is the objective of the Commercial Fishing Industry and in my opinion is a significant contributor to the current state of the fishery.

Management Triggers

Tier 1: Fishing Mortality (F) Triggers

Option A. Timeline to Reduce F to target.

Selection: A1 within 1 year

Option B: F Threshold Trigger

Selection: B1 F exceeds threshold

Option C: F Target Trigger

Selection: C1 F exceeds target for 2 consecutive years

Tier 2: Female Spawning Stock Biomass (SSB) Triggers

Option A: Deadline to Implement a Rebuilding Plan

Selection: A2 Two Year deadline to implement

Option B: SSB Threshold Trigger

Selection: B1 SSB falls below the threshold

Option C: Target Trigger

Selection: C3 No trigger related to SSB target

Tier 3: Recruitment Trigger

Option A: Recruitment Trigger Definition

Selection: A2 Moderate Sensitivity

Option B: Management Response to Recruitment Trigger

Selection: B2 Most Conservative Response

Tier 4: Deferred Management Action

Selection: Option A No Deferred Action and Option F

Recreational Release Mortality

Option A: Circle Hook Requirement Only

Selection: Option A

Option B: Effort Controls (Seasonal Closures)

Selection: B1: State Specific 2 week closures

Option B2: Spawning Area Closures

Selection: B2-a: No harvest during Waves 1 & 2

Option C: Gear Restrictions

Selection C1: Prohibit any lethal device

Option D: Outreach and Education

Selection D1: Outreach is Required

Rebuilding Plan

Recruitment Assumption for 2022 Assessment

Selection: Option B Low Recruitment Assumption

Process of Responding to the 2022 Assessment

Selection: Option B Board Action

## Conservation Equivalency

Option A: Board Discretion

Selection: Board Discretion

Option B1: Restricted Use of CE based on Status

Selection: B1 a and B1 c

Option B2: Applicability

Selection: B2 Hudson River and Delaware River & Bay

Option C: Precision Standards for MRIP Est.

Selection: C3 30 PSE

Option D: CE Uncertainty Buffer

Selection: D1 10 percent

Option E: Definition of Equivalency

Selection: E1 Apply the FMP standard @ coastwide level

Thank you for taking my comments on Draft Amendment 7.

Richard Kuhlman

316 Hillsmere Drive

Annapolis, MD 21403

From: [David Hoganson](#)  
To: [Comments](#)  
Subject: [External] Amendment 7  
Date: Friday, April 15, 2022 9:41:31 PM

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ASMFC,

I'm writing in strong support in aggressive measures to restore the stock of striped bass. Recent conservation moves have been materially inadequate and we are at risk of losing this fishery.

I am an avid surfcaster and kayak fisherman. We pursue striped bass as a family between myself, my three children and my father in law. We have decades of experience and the decline of the striped bass has been heartbreaking.

I strongly support striped bass as a game fish. Fundamentally, I believe for several years it should be catch and release only. Short of that, many changes should undertaken to minimize recreational and commercial impact on this fishery. The slot limit must be pushed up. I support 32-38". The commercial size should be the same and the commercial annual take drastically reduced.

Education efforts for anglers to promote good catch and release is essential. Enforcement efforts need to escalate and poacher punishment should be more severe. The bluefin tuna enforcement could serve as a guide. Tuna fishermen don't risk a \$50K fine, and similar punishment would deter striped bass punishment just the same. Stiff fines would fund enforcement which would increase collection of stiff fines. Everyone's awareness and commitment to preserve this fishery needs to be leveled.

Almost all striped bass fishermen I know are catch and release only with no boga use and incredible care of their fish to maximize survival. The greater group needs to move towards these best practices and the ASMFC can spearhead real change with Amendment 7. Mismanagement of this moment by the ASMFC would be a historic tragedy for our beloved striped bass. Please make us all proud of your choices.

I am in complete agreement with many others and below are my choices for Amendment 7.

Sincerely,

David Hoganson  
angler, father, physician, and strong supporter of striped bass

Chestnut Hill, MA  
Sandwich, MA

My oldest son on one of our many surfcasting outings enjoying catching and releasing a beautiful striped bass





Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

**From:** [cwilli06@gmail.com](mailto:cwilli06@gmail.com)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 9:41:23 PM

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Please make changes now to ensure abundance in the future generations of striped bass.

I'm a fly angler in CT. Catch and release only. I have 3 boys who are learning the sport and love to fish. Those are 3 great reasons for why we need to act now to save these amazing game fish. These fish are too valuable to the entire coastline to sit by idly and do nothing since they were declared overfished in 2018.

You have the power to make a difference. Don't let it go to waste.

Thank you  
Cory Williams

**From:** [Tim Mughherini](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 9:40:39 PM

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Hello

I am a recreational angler here in Massachusetts that fishes for striped bass 3-4 times a week during the season.

I love this fishery and these fish and hope they will be here for my children and grandchildren to enjoy.

Please support changes that manage this fishery for abundance not yield. I catch 100's of striped bass every season and I've never kept one or even eaten one. I support C&R practices that reduce the stress on the fish and any outreach and educational programs that support such.

We need to act fast with swift changes that will help these fish survive for generations to come. While I feel the current slot limit is better than 28" and above, I don't feel it is enough. These fish need time to spawn and higher length on the lower end of the slot would only help that. If we moved the slot to 30-35 inches this would give those fish a couple of seasons to spawn.

This or something similar needs to be done up and downstairs the east coast. Conservation Equivalency in its current state is just ripe for abuse. More stringent rules need to be applied here to prevent abuse in the future.

Thank you for your time, consideration, and hard work.

Respectfully

Timothy Mughherini  
Plymouth MA

--

Tim Mughherini

**From:** [spyridon.meares@icloud.com](mailto:spyridon.meares@icloud.com)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass PID  
**Date:** Friday, April 15, 2022 9:39:13 PM

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ASMFC Commission Attn: Emilie Franke,

Hi, my name is Spyridon Meares and ive been fishing all my life, I'm only fifteen so I haven't been around for the good old days, but I sure would miss em if I could.

I'm honestly depressed on how poorly the ASMFC has managed this fishery, and its hard to see a future where my kid or grandkid could fall in love with this fishery as I have.

There's something amazing about catching a fish, especially a fish as beautiful and majestic as the striped bass, these fish are far to valuable to only be caught once, and I fully support any move to turn them into gamefish.

I love the sport and the friends I've made, and I truly feel a sense of responsibility to help the population in any way I can. This same sentiment I feel is not held to a high regard by anyone in the regulatory body that makes up the ASMFC board. How many years does the SSB have to fall short of the target for changes to take place? If we all are only looking out for ourselves, we've lost sight of the big picture.

I have summarized my public comment, in support of each Option stated in the draft Amendment. I am concerned that somehow the commercial sector has not been considered at all in this document. There is heavy pressure on changing the regulations on the recreational sector, however it is negligent to assume the pressure put on Striped Bass by the commercial sector is any less detrimental. Numbers indicate rec people make up over double the harvest rate, but how is it possible to monitor and evaluate things like bycatch, bycatch release mortality, undersize release mortality, fishing method of take negligence (i.e. not checking nets, leaving nets in too long, gaffing, etc...)? This seems like a big oversight.

We have reached a point where mismanagement and greed have taken over sound science and understanding. Everyone will need to suffer in the short term in order to see a positive change. This is not lost on me, and I am in favor of it. Remember, IF THERE IS NO MORE STRIPED BASS COMMERCIAL FISHERMAN WON'T HAVE A JOB TO GO BACK TO.

Public comment on the Tier options for Amendment 7:

**Tier 1 Option A** – Support Sub-Option 1 (status quo). The effort should not be delayed any more than 1 year.

**Tier 1 Option B** – Support Sub-Option B1 (status quo). Again, let's make the adjustment time period as short as possible.

**Tier 1 Option C** – Support Sub-Option C1 (Status quo) – mortality should be assessed effectively, and a determination made in a shorter timeframe. Waiting for 3 years could effectively lead to collapse as data is collected.

**Tier 2 Option A** – Support Sub-Option A2 – A 2-year deadline will help to hold ASMFC parties, recreational anglers, and commercial fisheries accountable.

**Tier 2 Option B** – Support Sub-option B1 – obviously cannot support a nomangement trigger sub option.

**Tier 2 Option C** – Support Sub-Option C1 (status quo) – tighter timelines are more favorable. The population is obviously suffering already, why delay.

**Tier 3 Option A** – Support Sub-Option A3 – High sensitivity is needed to cause more frequent management of a suffering biomass.



**Tier 3 Option B** – Support Sub Option B2 – This seems to assume mortality based on an already low recruitment which would be conservative and triggers a tighter timeline for management programs.

**Tier 4** – Support Option A (status quo) – There should be no deferment, especially when the population is suffering and there is a data lag. This needs to hold responsible parties accountable.

4.2 Rec Management Measures and Options:

**Support Option B specifically Option B2-b** No Target Spawning closure required – the spawning fish need to be protected. How can you have a management trigger (SSB) if you don't protect them in the first place.

4.3 Commercial Fishery measures

While the recreational group represents the supposed high allotment of release mortality, it is ridiculous to not even reconsider the effect of mortality due to removal and bycatch of Striped Bass by the commercial sector. I support stringent recreational measure even to the point of a non-target or restriction of targeting Striped Bass. But to close down on the recreational angler and still allow commercial rigs to absolutely take advantage of a suffering population is ridiculous and shameful.

The management and enforcement bodies need to turn a fine focus on every party which utilizes our SHARED resource. How they are not considered only seems to support the assumption by many that the commercial fisheries remain a political card to be held by states, and to fund corrupt individuals in state government. Shameful.

4.4.1 Recruitment Assumption

**Option B support** – more conservative and will contribute to stricter management measures

4.4.2 Rebuilding Plan

Support Option B – rejecting the status quo will allow for voting and a reassessment of both commercial and recreational impact. This is a way to get the Commercial quotas evaluated and the bag limits, size/slots, among other things that somehow the Commercial sector was able to avoid in the general language of Amendment 7

4.6.2 Management Program Equivalency (CE)

**Support Option B** to restrict CE but encourage the removal of present CE programs sooner. States should not operate independently which encourages judgement outside of a likely biological and habitat based science and is heavily influenced by money and politics.

**From:** [Eric Braker](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 9:37:51 PM

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I grew up exploring and fishing the Chesapeake Bay watershed with my brother, and like countless other anglers, we have a special connection to the striped bass. We both dream and hope to see this fishery get back to where it was...

#### 4.1 Management Triggers

##### Tier 1: Fishing Mortality (F) Triggers

Support Sub-option A1 (status quo)

Support Sub-option B1 (status quo)

Support Sub-option C1 (status quo)

##### Tier 2: Spawning Stock Biomass (SSB) Triggers

Support Sub-option A2

Support Sub-option B1 (status quo)

Support Sub-option C1 (status quo)

##### Tier 3: Recruitment Triggers

Support Sub-option A2

Support Sub-option B2.

##### Tier 4: Deferred Management Action

Support Option A (status quo): No Deferred Management Action.

#### 4.2.2 Measures to Address Recreational Release Mortality

Support option A. SQ

Support Sub-option C1

Support Sub-option C2.

Support Sub-option D2

#### 4.4 Rebuilding Plan

##### 4.4.1 Recruitment Assumption for Rebuilding Calculation

Support Option B

##### 4.4.2 Rebuilding Plan Framework

Support Option B

#### 4.6.2 Management Program Equivalency (Conservation Equivalency)

Support Sub-option B1-a

Support Sub-option C3

Support Sub-option D2

Support Sub-option E2

Thank you,  
Eric Braker

**From:** [Matthew Aprea](#)  
**To:** [Comments](#)  
**Subject:** [External] Comment for Amendment 7  
**Date:** Friday, April 15, 2022 9:36:16 PM

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My name is Matthew Aprea and I am an avid surfcaster from the state of New York (although I primarily fish where I grew up on Cape Cod, MA).

Fishing for striped bass has kept me sober. I challenged myself to conquer that addiction, and now the hunt for large striped bass at night is my new "healthier" addiction.

This fishery is so special because it's accessible, and it gives so many people the opportunity to participate in this sport and participate in an appreciation for the world around us.

Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.  
Please stand up for the striped bass, and end overfishing as quickly as possible. Please manage  
stripers for abundance, and not yield!

Sincerely,

Matthew Aprea  
Brooklyn, New York  
Email: [mwaprea@gmail.com](mailto:mwaprea@gmail.com)

--

Matthew Aprea  
781.424.8918

**From:** [anthony mccann](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 9:35:18 PM

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Dear ASMFC, My name is Tony McCann\_ and I am from the state of \_Massachusetts Striped bass are important to me because The Commission can do something simple for the conservation of the striped bass for future generations ; ( of both fish and people ). The Cape Cod Canal should be made a catch and release zone for striped bass - it's a starting point to help insure the success of the bass survival as a species \_\_\_\_\_. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment. 4.1 TIER 1: Support A1 Support B1 Support C1 TIER 2: Support A2 Support B1 Support C1 TIER 3: Support A2 Support B2 TIER 4: Support A 4.2 None Support C1, C2 Support D2 4.4.1 Support B 4.4.2 Support B 4.6.2 Support B1-a Support C3 Support D2 Support E2 Thank you for the opportunity to comment, and I hope that my voice will be heard. Sincerely, Tony McCann 12 Hayward Street North Easton , Ma 02356 [tonymccann@verizon.net](mailto:tonymccann@verizon.net)

**From:** [Katie Theriault](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 Comments  
**Date:** Friday, April 15, 2022 9:30:32 PM

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To whom it may concern:

Hello, I am a recreational angler in Kittery, Maine and would like to voice my opinions on the draft amendment 7.

Below are my comments as they relate to the amendment:

#### 4.1 Management Triggers

##### Tier 1: Fishing Mortality (F) Triggers

###### Option A: Timeline to Reduce F to the Target

I am in favor of sub-option A1 (status quo): Reduce F to a level that is at or below the target within one year.

###### Option B: F Threshold Triggers

I am in favor of Sub-option B1 (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

###### Option C: F Target Triggers

I am in favor of Sub-option C1 (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

##### Tier 2: Spawning Stock Biomass (SSB) Triggers

###### Option A: Deadline to Implement a Rebuilding Plan

I am in favor of Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

###### Option B: SSB Threshold Trigger

I am in favor of Sub-option B1 (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

###### Option C: SSB Target Trigger

I am in favor of Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

### Tier 3: Recruitment Triggers

#### Option A: Recruitment Trigger Definition

I am in favor of Sub-option A2: The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

#### Option B: Management Response to Recruitment Trigger

I am in favor of Sub-option B2. If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

### Tier 4: Deferred Management Action

I am in favor of Option A (status quo): No Deferred Management Action.

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger

## 4.2.2 Measures to Address Recreational Release Mortality

### Option C. Additional Gear Restrictions

I am in favor of Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

I am in favor of Sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

### Option D. Outreach and Education

I am in favor of Sub-option D2: It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

## 4.4 Rebuilding Plan

#### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

I am in favor of Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

#### **4.4.2 Rebuilding Plan Framework**

I am in favor of Option B: 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 recruitment assumption specified in Amendment 7) 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.

#### **4.6.2 Management Program Equivalency (Conservation Equivalency)**

##### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

I am in favor of Sub-option B1-a: CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

##### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

I am in favor of Sub-option C3: CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

##### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

I am in favor of Sub-option D2: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

##### **Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

I am in favor of Sub-option E2: the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Thank you,

Katie Theriault



**From:** [Will Beveridge](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 9:29:59 PM

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My name is Will Beveridge,

I am an recreational striped bass fisherman that fishes primarily out of the Kennebec and Sasanoa rivers in Maine. I've grown up with the great privilege of catching striped bass for years with friends and family, creating memories that will last a lifetime. I would like the opportunity to share those same memories with my children one day. Therefore, I would like to vocalize by concern for the stock of striped bass through striped bass management amendment 7.

For Tier 1: I would like to see the status quo for each option for fishing mortality (F) triggers. I believe this will offer the most efficient and helpful response to aiding striped bass, great for the midcoast rivers of Maine.

For Tier 2: SSB triggers

For option A I would like to see management choose suboption A2

For option B I would like to see management choose suboption B1 the status quo

For option C I would like to see management choose suboption c1

For Tier 3: Recruitment triggers

For option A I would like to see management choose suboption A2

For option B I would like to see management to suboption B2

For Tier 4: Deferred management

I support option A for no deferred management. I believe regulation must be uniform across state lines to prevent one state from overharvesting. This is especially necessary for a species like striped bass whose range extends from NC to ME. In my eyes striped bass is primarily a sport fish that should be treated as such.

Let's do it for the rockfish and continue to make memories for generations to come!

Thank you,  
Will Beveridge

**From:** [Tess McNamara](#)  
**To:** [Comments](#)  
**Subject:** [External] Fwd: Amendment 7 Comments  
**Date:** Friday, April 15, 2022 9:29:53 PM

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To whom it may concern:

Hello, I am a recreational angler in Kittery, Maine and would like to voice my opinions on the draft amendment 7.

Below are my comments as they relate to the amendment:

#### 4.1 Management Triggers

##### Tier 1: Fishing Mortality (F) Triggers

###### Option A: Timeline to Reduce F to the Target

I am in favor of sub-option A1 (status quo): Reduce F to a level that is at or below the target within one year.

###### Option B: F Threshold Triggers

I am in favor of Sub-option B1 (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

###### Option C: F Target Triggers

I am in favor of Sub-option C1 (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

##### Tier 2: Spawning Stock Biomass (SSB) Triggers

###### Option A: Deadline to Implement a Rebuilding Plan

I am in favor of Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

###### Option B: SSB Threshold Trigger

I am in favor of Sub-option B1 (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

###### Option C: SSB Target Trigger

I am in favor of Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

### Tier 3: Recruitment Triggers

#### Option A: Recruitment Trigger Definition

I am in favor of Sub-option A2: The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

#### Option B: Management Response to Recruitment Trigger

I am in favor of Sub-option B2. If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

### Tier 4: Deferred Management Action

I am in favor of Option A (status quo): No Deferred Management Action.

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger

## 4.2.2 Measures to Address Recreational Release Mortality

### Option C. Additional Gear Restrictions

I am in favor of Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

I am in favor of Sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

### Option D. Outreach and Education

I am in favor of Sub-option D2: It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

## 4.4 Rebuilding Plan

#### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

I am in favor of Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

#### **4.4.2 Rebuilding Plan Framework**

I am in favor of Option B: 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 recruitment assumption specified in Amendment 7) 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.

#### **4.6.2 Management Program Equivalency (Conservation Equivalency)**

##### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

I am in favor of Sub-option B1-a: CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

##### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

I am in favor of Sub-option C3: CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

##### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

I am in favor of Sub-option D2: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

##### **Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

I am in favor of Sub-option E2: the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Thank you,

**From:** [ZipChip Sports](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 9:25:30 PM

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Hello,

My name is Alex Peru and I am patron of the outdoors from Connecticut. The striped bass is a unique organism in our natural world. We are disproportionately removing striped bass from the ecosystem to the detriment of the entire system. I implore you to enact the strictest management and not permit conservation equivalency on striped bass when they are overfished.

Yours truly,  
Alex Peru

**From:** [Capt. Eric Wallace](#)  
**To:** [Comments](#)  
**Subject:** [External] Addmentent 7  
**Date:** Friday, April 15, 2022 9:25:17 PM  
**Attachments:** [Outlook-horizontal.png](#)  
[Outlook-Coastal Fl.png](#)

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Please do what is needed to bring back this fishery to the level we know it can be!!!!!!! but that should NOT include seasonal closers. CE is not working if states like NJ can do whatever the hell fuzzy math they can get away with... Stop that crap!!!!!!! Lets get this right this time, groups like American Saltwater Guides have spelled it out and have chosen the best options in my view.....

Capt Eric Wallace

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## **Captain Eric Wallace**

Coastal Fly Angler



**COASTAL  
FLYANGLER**

207-671-4330

<http://www.coastalflyangler.com>

**From:** [Ryan Dunlap](#)  
**To:** [Comments](#)  
**Subject:** [External] Public comment  
**Date:** Friday, April 15, 2022 9:20:03 PM

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Hello,

I am an avid fisherman and always dedicated to protecting the fishery. It is our duty to promote the natural habitat and proper food change in our fragile ecosystem.

For Tier 1: Fishing mortality (F) triggers  
for each option I would like to see the status quo. I believe this will offer the most efficient and helpful response to aiding striped bass

For Tier 2: SSB triggers  
For option A I would like to see management choose suboption A2  
For option B I would like to see management choose suboption B1 the status quo  
For option C I would like to see management choose suboption c1

For Tier 3: Recruitment triggers  
For option A I would like to see management choose suboption A2  
For option B I would like to see management to suboption B2

For Tier 4: Deferred management  
For this tier I would like to voice that I support option A for no deferred management. Deferred management is a terrible way to manage a fish stock that is already experiencing overfishing. Regulation must be uniform across state lines to prevent one state from overharvesting. This is especially necessary for a species like striped bass whose range extends from NC to ME.

I hope we can help the bass. They deserve it.

Thank you  
Let's save the stripers

--

Best,

Ryan Dunlap  
p: 775-315-1409  
e: [dunlap2814@gmail.com](mailto:dunlap2814@gmail.com)

**From:** [rrrwest@yahoo.com](mailto:rrrwest@yahoo.com)  
**To:** [Comments](#)  
**Cc:** [2022stripercomments@gmail.com](mailto:2022stripercomments@gmail.com)  
**Subject:** [External] Amendment 7 comments for striped bass  
**Date:** Friday, April 15, 2022 9:16:16 PM

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To who it may concern at ASMFC

I am responding to the request for public comments on Amendment Seven for the management of striped bass. My name is Raymond West and I live in East Bridgewater MA. I appreciate you all taking the time to read my comments. I am asking for you all be aggressive in the actions you take to manage the striped bass population, and manage for abundance.

My choices for each proposed regulation are as follows:

4.1  
Tier 1  
A1  
B1  
C1  
Tier 2  
A2  
B1  
C1  
Tier 3  
A2  
B2  
Tier 4  
A  
4.2  
B- None  
C1, C2  
D2  
4.4.1  
B  
4.4.2  
B  
4.6.2  
B1-a  
C3  
D2  
E2

Again, thank you for taking action to save striped bass.

Ray west  
East Bridgewater ma 02333



**From:** [Brian Schubmehl](#)  
**To:** [Comments](#)  
**Cc:** [Michael Armstrong](#); [Dan Mckiernan](#); [Rep. Sarah K. Peake](#); [Raymond Kane](#); [LOWELL WHITNEY](#)  
**Subject:** [External] Amendment 7 Feedback  
**Date:** Friday, April 15, 2022 9:16:00 PM

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Good afternoon, all:

I hope this finds you well. Thank you for the opportunity to share feedback on Draft Amendment 7. By way of brief introduction, I'm Brian Schubmehl and I live on the Boston's north shore. I grew up hunting and fishing in Western New York, so when I moved to Massachusetts I was so excited to try saltwater fishing for the first time. The most epic saltwater gamefish of the northeast is the striped bass and I immediately fell in love with striper fishing (both fly and spin). I've recently become exclusively catch and release because of the pressures on these fish. I planned to buy a boat, but given the state of the fishery, I've decided not to make that investment until I see what happens in the coming years - I would buy a boat for the main purpose of striper fishing, so it doesn't make sense if they're not going to be here in any sort of quantity in ten years, which seems like a very plausible scenario if action isn't taken now.

What I love most about our recreational salt water fishery is its accessibility - I've met people from EVERY walk of life and of ALL ages fishing for stripers. There are endless places and ways to enjoy striper fishing, which is not the case for other ponds, rivers and streams with increasingly limited access over my lifetime. If we want people to be outdoors, enjoying this sport and stimulating our economy, we need to have an abundance of fish for that to be possible. If nothing changes, I see a future with fewer stripers and think about how that affects not only my fishing prospects, but the local tackle shops and even the big box stores. I don't have a boat to chase tuna or bottom fish, so there must be others like me who see stripers as their way to interact with this amazing fishery from shore - and without them, it's only harder to partake in this pastime.

I am grateful for the opportunity to share what I support in the Draft Amendment 7 - found below. Overall, I believe we need to increase stocks by mitigating mortality. With the amount of money to be earned in the recreational fishing economy, this could truly be a economic engine for coastal communities if stocks are allowed recover to historic highs and furthering access for diverse communities to enjoy this fishery.

On 4.1 Management Triggers, I support:

Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality;

Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold;

Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions;

Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped.

On 4.2.2 Measures to Address Recreational Release Mortality, I support:

Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method;

Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices.

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, I support:

Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. We recognize this option may require more restrictive management measures than option A, which we support.

On 4.4.2 Rebuilding Plan Framework, I support:

Option B to allow the Board to take direct management actions as well as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029.

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, “Management program equivalency (also known as “conservation equivalency” or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

I believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically, I support:

Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level;

Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates;

Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries;

Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coast wide level.

With many thanks for your consideration -

Brian

Brian J. Schubmehl  
Marblehead Fly Company  
Marblehead, MA

**From:** [Tom McKelvey](#)  
**To:** [Comments](#); [Comments](#); [Maureen Davidson](#); [Emerson Hasbrouck](#); [James Gilmore](#); [CAROL HOFFMAN](#); [Sen. TODD KAMINSKY](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 9:13:57 PM

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To all ASMFC members

I am an avid angler and most of my free time is spent on or near the water fishing. I spend a considerable amount of money on this hobby whether on tackle, transportation, etc.

I am completely stunned that 3 years ago the striped bass fishery was deemed to be overfished and overfishing was occurring, yet we are still debating on what measures to take to save the stock. Yes, a quick slot limit was put into to play but it included CE benefits. You and I both know, that is not going to help this fishery. Then you release a 149-page draft document for public comment. Who does that? Did you think you would overwhelm enough people that they wouldn't take the time to comment? I hope many prove you wrong.

Striped bass needs to be managed for abundance. As an angler, I want to be able to catch fish. I would rather catch all day without being able to keep any, then to be able to keep 1 or 2 but not be able to find them since their numbers are declining at a rapid rate. An area that I have fished spring and fall years past, held no fish last year. There have been no other changes in this particular area, so it seems to be due to their overfished status. I have friends who run charter boats, tackle shops, etc. I do not want to see them go out of business due to the fishery collapsing. What about the restaurants, delis, gas docks etc that rely on these businesses to bring in monies to their area from anglers going fishing? Florida seems to understand that fish in the water equals revenue for all types of business as well as the state. If we keep harvesting the stock, there will be nothing left. Recruitment the last few years has been down and now the 2015 class is set to hit the slot limit. Where will we be in a year or 2? I know some say they need to harvest to put food on the table. Really?? That is pretty expensive fish if you are paying for a charter, party boat or even gas and bait to fish the beach. Better off buying it at the fish market.

Shouldn't we leave the fishery in better shape for future generations? I think we should, and I know a lot of others that feel the same way.

I agree and support the stance of the ASGA.

Below please find my options for Amendment 7:

Tier 1:	Tier 2:	Tier 3:
Sub-option A1	Sub-option A2	Sub-option A2
Sub-option B1	Sub-option B1	Sub-option B2

Sub-option C1	Sub-option C1
Tier 4: Option A (No deferred management plan)	
Measures to address release mortality: Sub-option C1 Sub-option C2 Sub-option D2	
Rebuilding plan: -Recruitment assumption Option B -Framework Option B	
Equivalency: <b>OVERFISHED, NO CE!!</b> Sub-option B1-a Sub-option C3 Sub-option D2 Sub-option E2	

Thank you for your time.

Thomas McKelvey  
New York

**From:** [Frank Breakell](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 9:11:58 PM

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Dear ASMFC,

My name is Frank Breakell. I am from the state of New Jersey. I have been fishing for striped bass for as long as I can remember. I started with my father on the beaches, jetties, and sod banks. I remember the moratorium of the 1980's. I also recall how that helped to rebuild the stocks to epic levels. We enjoyed fantastic fishing throughout the mid 1990's and early 2000's. Unfortunately the regulations and other acts that were in place were poorly managed and allowed the current population decline to occur. We need strong regulations now. Regulations that will be properly monitored and maintained to allow the striped bass population to bounce back.

As a father myself now, I have enjoyed many days and evenings out with my daughters catching striped bass. As a charter captain/fishing guide I rely on the striped bass for my business. With all of the other regulations in place, the closed seasons, and general lack of other fish species, the striped bass is greatly needed.

So as an avid fisherman and charter captain I am in favor of the following choices in Amendment 7: under Tier 1, I support A1, B1, and C1. Tier 2, I support A2, B1, and C1. Under Tier 3, I support A2, and B2. In Tier 4 I like option A. In 4.2, I like C1, C2, and D2. In 4.4.1, I support option B. In 4.4.2, I support option B. In 4.6.2, I support Options B1-a, C3, D2, and E2.

Thank you for the opportunity to share my views and voice my opinion. I hope that my voice will be heard concerning this magnificent fish that brings so much joy and commerce to the Eastern seaboard.

Tight Lines and Best Regards,  
Capt. Frank Breakell  
Brynnie-B Inshore Fishing, LLC  
Brown Dog Bombs Rigs  
<https://www.brynniebfishing.com>  
609-425-9401

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**From:** [john.abplanalp](mailto:john.abplanalp@ct.gov)  
**To:** [Comments](#)  
**Cc:** [Attorney.General@ct.gov](mailto:Attorney.General@ct.gov); [Justin Davis](#); [Matthew Gates](#); [ROBERT LAFRANCE](#); [Sen. Craig A. Miner](#); [Rep. Melissa Ziobron](#); [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7 (Striped Bass Management) Public Comments - Ct Resident  
**Date:** Friday, April 15, 2022 9:09:54 PM

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Dear ASMFC,

My name is John Abplanalp and I am from the city of Stamford in the state of CT. Striped bass are important to me because of it's recreational, historical, economic (recreational \$'s DWARFING commercial \$'s), and, most importantly, it's natural and ecological significance and importance. i have seen it's previous depths (which we are rapidly approaching again, if not there and beyond) and it's subsequent recovery..

It is almost inconceivable to me that we have arrived in this same (or worse) position (critical depths) again..

While my absolute preference would be a "no possession", catch and release only, 3-5yr moratorium (and along with the adoption of the MOST aggressive/conservative complete ecological systems support - water quality, habitat preservation/restoration, forage species, predation, fish handling best practices, gear restrictions - circle hooks for bait, total elimination of treble hooks, amongst - etc), below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.....

4.1<sup>1</sup><sub>SEP</sub>

TIER 1<sup>1</sup><sub>SEP</sub>  
Support A1<sup>1</sup><sub>SEP</sub>  
Support B1<sup>1</sup><sub>SEP</sub>  
Support C1

TIER 2<sup>1</sup><sub>SEP</sub>  
Support A2<sup>1</sup><sub>SEP</sub>  
Support B1<sup>1</sup><sub>SEP</sub>  
Support C1

TIER 3<sup>1</sup><sub>SEP</sub>  
Support A2<sup>1</sup><sub>SEP</sub>  
Support B2

TIER 4<sup>1</sup><sub>SEP</sub>  
Support A

4.2<sup>1</sup><sub>SEP</sub>

None<sup>1</sup><sub>SEP</sub>  
Support C1, C2<sup>1</sup><sub>SEP</sub>

Support D2

4.4.1<sup>[SEP]</sup>

Support B

4.4.2<sup>[SEP]</sup>

Support B

4.6.2<sup>[SEP]</sup>

Support B1-a<sup>[SEP]</sup>

Support C3<sup>[SEP]</sup>

Support D2<sup>[SEP]</sup>

Support E2

Thank you for your time and consideration and for the opportunity to comment. I truly hope that my voice will be heard (and understood)..

(And, please, err on the side of the resource and take the MOST conservative and aggressive approach...)

Peace,

john abplanalp  
Stamford, CT<sup>[SEP]</sup>  
jabplana@optonline.net  
(1-914-282-3469 - C)

Sent from my iPhone

**From:** [Kevin Grennan](#)  
**To:** [Comments](#)  
**Subject:** [External] Fwd: Comment for Amendment 7  
**Date:** Friday, April 15, 2022 9:07:22 PM

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## **Subject: Comment for Amendment 7**

My name is Kevin Grennan and I am an avid surfcaster from the state of Massachusetts. I am a shorebound fly fisherman, and striped bass are my primary target when fishing saltwater. I am very concerned that the striper fishery is in danger. I support catch restrictions not just on recreational anglers but on commercial fishing as well. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2



Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Kevin Grennan  
Hadley, Massachusetts  
Email: [grennan@umass.edu](mailto:grennan@umass.edu)

“Fishing - Precision guesswork based on unreliable data provided by those of questionable knowledge.” - Henry Standing Bear  
Sent from SemperFly's iPad

**From:** [pbadad300](#)  
**To:** [Comments](#)  
**Subject:** [External] Comment for amendment 7  
**Date:** Friday, April 15, 2022 9:01:31 PM

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My name is William DeLizio and I am an avid surfcaster from the state of Connecticut. As past president of the Ct Surfcasters Association and an avid striped bass surf fisherman, I have experienced the drastic reduction in striped bass over the last 12 or so years. Lately having a good night plying in the surf fishing may be seeing a good asteroid display or a star show. Don't take me wrong nature and astronomical sightings are wonderful but I took my effort to hopefully catch at least 1 striped bass. Please consider my choices on amendment 7 and make prudent decisions on striped bass spawning areas for conducive conditions to foster abundant YOY for future generational enjoyment. Along with this, increasing the legal harvest size to 36" and leave the more productive younger breeders to reproduce. Please do what's right for the species future and give us and our future fisher persons a opportunity to enjoy what I have had at the turn of the 22st century.

Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2  
Support B1-a  
Support C3  
Support D2  
Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

William DeLizio  
North Branford, Connecticut  
Email

Sent from my Verizon, Samsung Galaxy smartphone

**From:** [Alexander Kaye](#)  
**To:** [Comments](#)  
**Subject:** [External] Comments About Amendment 7  
**Date:** Friday, April 15, 2022 9:01:15 PM

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My name is Alexander Kaye and I am an avid surfcaster from the state of Maine. I am a committed striped bass surf caster. Although I am relatively young in comparison to many of the guys who have been in the game for decades, I feel just as strongly about striped bass. I know that the fishery as a whole, from the south all the way through Maine is being mismanaged. Fish are being threatened throughout their entire lives and not enough is being done to protect them. This must change. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Alexander Kaye

Scarborough, Maine

Email: [stuffguy612@gmail.com](mailto:stuffguy612@gmail.com)

**From:** [Bryon Detwiler](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 8:57:13 PM

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Dear Ms. Franke and members of the ASMFC:

Thank you for the opportunity to comment on Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Stripes Bass. Being an avid angler as well as working within the fishing industry I am writing you this letter to express my deep concern regarding the current state of the wild Atlantic Striped Bass fishery. To start I'd like to say the writing has been on the wall for years with data to show how badly this fishery needs your immediate action and help. I along with many of my peers of both NYS (where I currently reside) as well as other states agree that this fishery has been in the past and even more so now in big trouble. It is for these reasons I am providing you a summary of what I'd like Amendment 7 to accomplish within that standards you have given us. This issue cannot be ignored any longer or else I fear we may do some damage that will have truly irreversible effects. Thank you for your time and I hope together we can fix this issue before it's too late.

Spawning Stock Biomass Triggers: Tier 2 - I support sub-option A2, sub-option B1, and sub-option C1

Deferred Management Plan: Tier 4 - I support option A

Outreach and Education: I support sub-option D2

Rebuilding Plan Framework: I support option B, and sub-option C3

Option D. CE Uncertainty Buffer for Non-Quota Managed Fisheries: I support sub-option D2

Option E Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries: I support sub-option E2

Thank you for your time.  
Sincerely, Bryon Detwiler

Sent from my iPhone

**From:** [Brian Ibanez](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 8:57:01 PM

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My name is Brian Ibanez and I am an avid boat fisherman from the state of Connecticut. My name is Brian Ibanez and I am an angler in Connecticut and I have been fishing the saltwater for Striped Bass since 2012. I have a 4 year old son who's grandchildren, I hope, will be able to enjoy the resource. I do not have the time nor expertise to dissect Amendment 7, but I would like to indicate that I am in strong support of regulations designed to limit the harvesting of Striped Bass for recreational and commercial use to preserve the species. I would be supportive of a complete moratorium on Striped Bass harvest for any reason other than scientific research. Now is the time to stand up and make aggressive changes to protect the fishery we love. I hope you will do the right thing. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

#### 4.1

##### TIER 1:

Support A1

Support B1

Support C1

##### TIER 2:

Support A2

Support B1

Support C1

##### TIER 3:

Support A2

Support B2

##### TIER 4:

Support A

#### 4.2

None

Support C1, C2

Support D2

#### 4.4.1

Support B

#### 4.4.2

Support B

#### 4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Brian Ibanez  
Greenwich, Connecticut  
Email: [brian.ibanez@gmail.com](mailto:brian.ibanez@gmail.com)



**From:** [Brett McCrae](#)  
**To:** [Comments](#)  
**Cc:** [Bryan Plumlee](#); [Monty Mason](#); [Emilie Franke](#); [MARTIN GARY](#); [Patrick Geer](#); [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7 - Comments  
**Date:** Friday, April 15, 2022 8:55:48 PM

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Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board,

I'm writing to voice my support of the comments proposed in the American Saltwater Guides Association letter regarding striped bass management. The current position of the fishery is tragic. The only thing more tragic still, would be to have the species further decline when we have the ability to change the trajectory of the fishery.

Whether considering management triggers, post-release mortality measures, or other efforts, please consider and enact the most aggressive measures possible to rebuild our striped bass fishery.

Thank you for your consideration of these comments.

Best,  
Brett McCrae  
Alexandria, VA

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Sent from my iPhone

**From:** [Mark Philippe](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 8:51:21 PM

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Dear Representatives of the ASMFC,

I'm taking the time to write this email for the simple reason that striped bass hold such an importance in my life. I'm 71 years of age and I have been fishing for them since I was 16. I've seen the fishing at its pinnacle and I've seen fishing for stripers at rock bottom. We may not be at rock bottom yet, but it seems close.

For the past few years I've noticed many guides who used to make a good income melt away, and the lack of fish at many locations where once upon a time there were hundreds. Recreational anglers, too have diminished in number. The responsibility for this falls on many shoulders, including Mother Nature. But you already know this.

What occurred in the 80's and 90's as far as the crash and the revival is concerned, has lost much of its relevancy. Social media has been a gamechanger. Wherever the stripers gather, there are fishermen there to catch them, because friends tell friends, and so on. There lacks a sanctuary, except maybe the federal exclusion zone and even there poaching is taking place. To me, this complicates forming solutions to increase striper abundance.

That begs the question, "What must be done?" Amendment 7 has many positive ideas for solutions to this problem. I have included my selections for what seem to make the most sense for increasing the numbers of stripers.

I know there is a large weight on your shoulders to guide us through this. There are many divergent thoughts and needs. I'll leave you with this: in the short term your decisions may not please everyone, but in the long term, if stripers once again become plentiful, you will have pleased all of the stakeholders.

Please do everything you can to make this great fish plentiful again.

Regards,

Mark Philippe

## **My Preferences for Management of Striped Bass**

**4.1 Management Triggers**                      Tier 1:  
- Option A1

- Option B1
- Option C1
- Tier 2:
  - Option A2
  - Option B1
  - Option C1
- Tier 3:
  - Option A3
  - Option B2
- Tier 4:
  - Option A

**4.2.2 Recreational Release Mortality**      Option A

- Option B1: No
- Option B2: No
- Option C1
- Option C2
- Option D1

**4.4.1 Rebuilding Plan**      Option B

**4.4.2 Rebuilding Plan Framework**      Option B

**4.6.2 Management Program**  
**Equivalency**      -Sub-Option B1a

- Sub-Option B1c
- Sub-Option B2b
- Sub-Option C3
- Sub-Option D3
- Sub-Option E2

Sent from my iPhone

**From:** [Kate Farnham](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 8:46:40 PM

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Dear ASMFC board members,

My name is Kate Farnham I am Registered Maine Fishing Guide and my summers are literally planned around chasing striped bass in the lower Kennebec river.

I have been striper fishing since I was little girl and have seen the over the course of my life the decline of this valuable fishery and it is profoundly troubling.

I believe that conservation equivalency's approach to management to be flawed and think it is worth while to approach an alternative management with these goals in mind:

-Equivalency for CE proposals should meet the state-specific level.

-No CE's permitted when striped bass are overfished.

-I also believe any new management must be science-based, quantifiable, and enforced.

I look forward to hearing the outcome of the board and hope your careful consideration and forward thinking helps move us in the direction of preserving this fragile game fish for many generations to come.

Sincerely,

Kate Farnham RMG

Sent from my iPad

From: [Kane Haffey](#)  
To: [Comments](#)  
Cc: [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
Subject: [External] Draft Amendment 7  
Date: Friday, April 15, 2022 8:45:32 PM

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ASMFC,

My name is Kane Haffey. I'm an avid angler in my 20s, and feel incredibly fortunate to fish in the northeast. My home waters are in Massachusetts - along the South Shore, Cape, and Islands. Striped Bass are inextricably tied to this region - both as an honored pastime, and as a key element in the natural order. However, we need positive reform in how we manage this fish to ensure that we rebuild the Striped Bass population quickly while preventing them from being overfished again.

I've been hooked on fishing for and appreciating Striped Bass since my first striper around age 8. Since then, I've learned more about Striped Bass, and the pressing challenges the species faces. It's time to make a difference for this fishery so that my children, their children, and many generations to come can responsibly enjoy Striped Bass.

I'm aligned with and support the American Saltwater Guides Association position on Amendment 7. In particular, I care most about the following:

- Conservation Equivalency (CE) has been the most misused management tool in this fishery. There's no accountability for states using CE's: the data limitations often can't support the use of CE's; and the track record for many CE's is appalling. [Sec. 4.6] We need the following guardrails:
  - No CE's permitted when striped bass are overfished.
  - Data used in CE proposals must meet the federal standard of 30 Percent Standard Error or less.
  - We need a 25% Uncertainty Buffer (front-end margin of error) built into any CE.
  - Equivalency for CE proposals must meet the state-specific level.
- We can't afford to weaken any existing Management Triggers nor delay implementation of action as the result of a Trigger. Allowing Deferred Management Action would be a setback. [Sec. 4.1]
- We need the most conservative recruitment triggers and fastest timeline for any required rebuilding plan. [Sec. 4.1]
- Seasonal Closures, as outlined in this draft, are not a reliable way to reduce striper mortality. Any new steps must be science-based, quantifiable, and enforceable. [Sec. 4.2]
- We must use the more recent, more conservative spawning success measures in calculations (Low Recruitment Assumption). [Sec. 4.4]

I will be following the outcomes on these important decisions, and trust that the fisheries managers and ASMFC will make a positive difference for the future and management of Striped Bass.

Thank you,  
Kane

**Kane Haffey**  
[kanehaffey@gmail.com](mailto:kanehaffey@gmail.com)

**From:** [Pete Gray](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 8:44:15 PM

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Dear Commission Members,

Below, I have outlined my comments on proposed Striped Bass Amendment 7.

My name is Peter Gray and I am from Clinton Corners, NY. I fish extensively in Long island sound, Raritan bay, and in the waters around Martha's Vineyard. I am an avid surfcaster and I specialize in light tackle. I spend over \$5000 a year on saltwater fishing guides specializing in light tackle fishing in New York, New Jersey, and Massachussetts.

Before I comment on the individual pieces of the proposed Amendment 7, I would like to make a few general comments and recommendations.

My comments to the individual questions/tiers related to Amendment 7 in a list at the end of this document. I have highlighted a few notes of importance prior to outlining my specific preferences.

- The public information document for Amendment 7 was quite complex and I believe it dissuaded public engagement. In the future, at minimum, there should be a summary document that is short enough for the average angler to read in less than 15-minutes and can be understood by everyone. This engages public participation instead of discouraging folks from getting involved.
- The ASMFC has stated that the public is losing faith in their ability to make swift, critical decisions based on science and public input. Please, act fast and in accordance with science and the majority's wishes: do not delay or we will lose this fishery forever. We are already behind in the current 10-year rebuilding process.
- This is a critical juncture for the striped bass. Please, consider managing the striped bass for abundance and not for yield when making your decisions. Note that the striped bass fishery is almost entirely a recreational, catch and release, fishery, and that is where the largest portion of the GDP generated by the fishery comes from. The good news is, the more fish in the ocean, the better it is for everyone: the fish, the overall economy, and recreational anglers.

- In the past, the ASMFC has adopted measures with low statistical chances of being successful, over very long timelines. I believe this is the wrong way to manage this fishery. We need better management and more aggressive measures that have a higher likelihood of protecting the fishery, and rebuilding and responding more quickly. I am in support of management that favors keeping “too many” fish in the ocean and responding to low spawning years and increased effort on a year-by-year basis.
- I am in complete opposition to any measure that would decrease the benchmarks the fishery is managed by. That is, we should not be lowering or shifting baselines. We have managed the population well in the past and should never consider decreasing our population targets (SSB thresholds and triggers). A sliding baseline is unacceptable and will be the demise of this fishery and will discourage angler participation.
- Above all else, I ask that the ASMFC act quickly, decisively, and with abundance- not yield- at the forefront of their striped bass management decisions. We must rebuild this fishery in less than 10-years, and at all costs, and that requires immediate and aggressive action from the commission. We are already behind in our rebuilding schedule.
- As a recreational angler who fishes a good deal in New Jersey, I have witnessed the abuse of the bonus program. When less than half tags that are allocated are returned, it means one of two things. Folks aren’t tagging all of the fish that they are harvesting or there are not enough fish to fill the quota! This program has practically become a “get of jail free” card for folks harvesting undersized fish. I have personally witnessed undersized fish being harvested at marinas and on shorelines across the state without affixing a tag. This program should be suspended indefinitely. When SSB thresholds reach target levels, it may be reconsidered if it is used properly for science-based research.

Below, I have outlined my preferences for Amendment 7.

On 4.1 Management Triggers, I support:

- Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality
- Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold
- Tier 3: options A2 and B2 to set meaningful thresholds for juvenile



stock health, and require measurable actions

- Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, I support:

- Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method
- Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, I support:

- Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. We recognize this option may require more restrictive management measures than option A, which we support

On 4.4.2 Rebuilding Plan Framework, I support:

- Option B to allow the Board to take direct management actions as well as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, “Management program equivalency (also known as “conservation equivalency” or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

I believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically, I support:

- Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level
- Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates
- Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries
- Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

Thank you for providing the opportunity to comment on Amendment 7. I look forward to learning the outcome of the upcoming stock assessment and to reading the final version of the Amendment.

Regards,  
Peter Gray  
1709 Bulls Head Road  
Clinton Corners, NY 12514

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Peter Gray  
[peterglgray@gmail.com](mailto:peterglgray@gmail.com)  
646.483.7438

**From:** [Michael Clark](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft amendment 7  
**Date:** Friday, April 15, 2022 8:30:24 PM

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To whom it may concern,

I grew up on the New England coast, and striped bass have been an integral part of my family, my relationship with people I love, and my childhood. They are the first species of fish I ever caught, and the first species I caught on a fly once I launched into the world of fly fishing that now gives my life peace, happiness, and professional opportunity. Stripers were the start of it all for me, and I revere, love, and respect them, which is why I feel extremely motivated to make this comment today! Here is my submission below, and thank you for your time!

#### 4.1 Management Triggers

Tier 1: Fishing Mortality (F) Triggers

Support Sub-option A1 (status quo)

Support Sub-option B1 (status quo)

Support Sub-option C1 (status quo)

Tier 2: Spawning Stock Biomass (SSB) Triggers

Support Sub-option A2

Support Sub-option B1 (status quo)

Support Sub-option C1 (status quo)

Tier 3: Recruitment Triggers

Support Sub-option A2

Support Sub-option B2.

Tier 4: Deferred Management Action

Support Option A (status quo): No Deferred Management Action.

#### 4.2.2 Measures to Address Recreational Release Mortality

Support option A. SQ

Support Sub-option C1

Support Sub-option C2.

Support Sub-option D2

#### 4.4 Rebuilding Plan

##### 4.4.1 Recruitment Assumption for Rebuilding Calculation

Support Option B

##### 4.4.2 Rebuilding Plan Framework

Support Option B

#### 4.6.2 Management Program Equivalency (Conservation Equivalency)

Support Sub-option B1-a

Support Sub-option C3

Support Sub-option D2

Support Sub-option E2

**From:** [Eric Cronin](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 8:29:06 PM

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Hi Emilie,

I wanted to write this group to express my opinions on the Current stock of Striped Bass and the Management attached to them Coast Wide. I don't have a life of sentimental stories built up of catching Striped Bass I would like to tell. I have worked in Healthcare the better part of the past decade and work to support a group of patients that are underserved, underrepresented, and have a very difficult history. I have participated in many Advocacy and Lobbying activities for these patients in order to preserve their Treatment Centers and ensure they will always have the highest level of care available to them despite the constant pressure and attack from public law makers on the grants that keep our Centers in tact. The life span of our patients has greatly increased over the past 40 years because of Advocacy, Legislation changes, and improved care and methods for our patients.

How does this relate to Striped Bass? Well it's a complicated issue of a Critical species to our economy and ecosystem that has been overfished for years, and continues to decline over time. If we continue on the path as consumption animals only focusing on who's money to protect in this fight, then before we know it the pot of money will run dry for all. The stock will be overfished completely, so instead of helping the species you are killing them off. However, I think with the same thinking, advocacy, and changes that happened over the last 40 years for our patients, we too can save, protect, and advance the Striped Bass species for all parties to benefit and enjoy equally.

There is a lot of finger pointing happening as to who is mostly responsible for the stock being where it is, Commercial blames Recreational since there are more Rec than Comm guys fishing and mishandling. Rec guys blame Commercial guys since they are allowed to decimate the breeding stock of fish every season. Lawmakers and decision makers are not uniformed up and down the Striper Coast with different rules and regulations in each state for the same species.

The economic impact this species has had on the Eastern Seaboard is in the 100's of billions of dollars. With the Recreational economic impact outweighing the Commercial impact fairly significantly. With a declining stock of Striped Bass in a time that is crucial to their species and an economy that ebbs and flows as much as the tide, this is a pivotal moment to ensure the survival and revival of the species as well as the survival of many people who are Commercially fishing, running bait and tackle stores, charter captains and many more.

My story is that I got back into fishing when the Pandemic hit. Like hundreds of millions of other people who needed to find a coping mechanism for isolation. This is both a great thing and bad thing if you think about how much the fishing industry boomed during this time. The bad part about this is you now have all these new anglers going out and fishing with zero experience or understanding of how to fish and properly handle fish. This issue further complicates when you add in Social Media. Social Media drives our society, and when someone catches large fish and post about it, their friends notice and want to get in on the action.

This most certainly increases the overall Recreational Angler Kill rate. If it is at 9%, I am assuming that is for an experienced angler that cares about the fish and its survival. Someone who has never fished for a bass, and wants pictures may keep that fish out of the water for minutes. And have no clue how to revive it. I watched a guy drop a bass off a 25 foot bridge to the water below. He was there for 25 minutes. Caught 1 fish. Dropped it to its death and went home happy. That kill ratio gets him in the baseball hall of fame.

But for the sake of easy numbers. If before the pandemic there were 1000 Rec Permits in MA. And 9% of the fish they caught were killed for various factors: harvesting, mishandling, gut hooking, gill hooking etc. If everyone caught 500 fish, 500,000 fish would be caught that season, and roughly 45,000 would be killed. Well Pandemic times the desire to fish increased. If 5x the number of Permits were given for Saltwater fishing, the fish killed would be 5x higher. This is a conservative estimate. This also does not take into account any other state than MA. The fish stock is not growing as quickly as the number of hooks and people looking to catch them did in that short period of time. The pressure got significantly higher on those fish that were already in trouble. And being that the 9% is a number that is not accounting for novice anglers, who could be killing 1 in every 4 or 5 fish they catch, the number of fish killed in one state's waters in a season could be well over 225k fish.

Everyone I have spoken to has expressed the same sentiments. You need to protect the breeders and the 2015 stock. 2015 being the last significant stock of fish is just reaching low slot size. So these fish will now be caught and killed this season. I support increasing the Slot limit to be 31-35".

So if the above is the general thinking, then why are the Commercial fishermen allowed to target the biggest fish? The breeding fish are not legally allowed to be kept by Recreational guys. Anything over 35 is off limits. But poaching sure as hell happens, which is an impossible task to police given the 700 miles of Coastline needed to be policed. But you are legally allowing hundreds of thousands of pounds of the life blood of the species to continually be killed off by commercial fisherman, who believe they have rights to the fish their family's have overfished for decades.

I am not sure I understand any reason to increase quotas on a fish that is in as poor stock as Striped Bass. Is it simply so Commercial Fishermen can make money to pay bills? Even from a Macro Economic stance of simple supply and demand, increasing quotas, and destroying a fish stock will only destroy the entire economic fishing industry for this species. The supply of the fish is not great, but demand may be high, so prices should remain high. By shrinking the quotas to protect the economy of striped bass, those principles should remain the same. High demand and high prices. If you are increasing the supply to match an increase in demand, all the while killing off the stock of cash cows, literally and figuratively, then you are effectively killing the industry. So every Comm guy who argued about the decreasing fishing days, and quotas would lose them money, well there will be no money to be had when there's no stock.

This is a pivotal moment for an entire industry to stand up and make significant changes to protect a species from being overfished and sent towards a second moratorium. The shortsightedness of protecting Commercial quotas and regulations to allow the breeding stocks to be decimated and not rebuild stocks, will cause a complete collapse of an industry worth hundreds of billions of dollars.

I consider myself very fortunate to have joined a group of Anglers from MyFishingCapeCod

when the Pandemic began. When I go down a road, I want to learn and study and understand everything. The community I joined has been crucial to understanding the conservation issue we are all facing. It is also through this group where I have learned a tremendous amount about safety with regards to the fish and the importance of proper handling and revival to maximize it's potential for survival. There are not many people like myself who would invest the time and energy I have into a passion like Saltwater Fishing. I have educated myself on the fish I handle. There's thousands of others out there who jumped into it at the same time, but did not take the road of education like I had when I started back into it.

Commercial anglers being able to catch and kill 35+" fish is no better than allowing recreational anglers to catch and harvest fish in the Cape Cod Canal, or allowing fish to be caught in known Spawning areas during the Spring migration. It is a major pinch point that sends enormous amounts of fish through. It's far too easy an area to catch large fish only to be seen mishandled and floating belly up in the current every year. If you truly want to help the fish, there really should be a mandatory seminar or webinar on proper handling of fish required to take and pass before being issued a saltwater permit.

I support extreme measures to be made where all anglers need to bear the brunt of responsibility to the stocks decline. I keep 1 Striped Bass per season. Which honestly may be 1 too many. There shouldn't be one side that suffers more than the other if we are truly trying to save the fishing stock. If the choice is to continue as is, well then it is clear that short term monetary sustainability is your focus, and long term economic sustainability is not the goal. I know I am just 1 voice, but hopefully there is a message in here that can convince or change the stance of someone at the decision making level that will make changes to protect our Striped Bass populations for generations to enjoy well beyond my time here.

Eric Cronin

Below is my stance on Amendment 7

Tier 1:

A1

B1

C1

Tier 2:

A2

B1

C1

Tier 3:

A2

B2

Tier 4:

A

4.2:

NA

C1, C2

D2

4.4.1:

B

4.4.2:

B

4.6.2:

B1-a

C3

D2

E2

**From:** [Dan Tarkinson](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 8:27:33 PM

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To whom it may concern:

I am an avid recreational Striped Bass angler in Portland, Maine. I spend 30-40 days on the water each summer and fall chasing stripers in Casco Bay. The joy I get from mornings on the water chasing these fish is priceless. Please do all within your powers to rebuild the stocks to healthy levels as quick as possible including all measures of protection that can be considered. I would support the strictest of regulations that would protect the most fish from both commercial and recreational harvest.

Sincerely,  
Dan Tarkinson  
Portland, Maine



**From:** [Mack Hartwell](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 8:23:57 PM

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As a fly fisherman hoping to be able to target striped bass on the eastern coast of the US, I wanted to weigh in during the public comment period and voice my support for many of the American Saltwater Guides Association make in favor of conservation measures relating to **4.6.2 Management Program Equivalency**.

I am not a fisheries biologist or expert by any means, but I trust that the guide community have the best interests of the fishery in mind, and seek to preserve this precious natural resource for future generations to experience and enjoy. I truly hope their recommendations are taken into account.

Thank you for seeking public comment!

-Mack Hartwell  
Columbus, Ohio USA

Sent from my iPad

**From:** [Christopher Kouimanis](#)  
**To:** [Comments](#)  
**Subject:** [External] Comment for Amendment 7  
**Date:** Friday, April 15, 2022 8:22:00 PM

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My name is Christopher Kouimanis and I am an avid surfcaster from the state of New York. # The striped bass fishery is one of the most unique and sedimental fishery for the community that I live it! I've grown up and seen it at its best and at its worst. The time to change things for the greater good is now. We need to stop the poachers from fishing in the early breeding season and killing all sized bass and we need to stop the over fishing for harvest of the fish!!! In order to have these fish around for ever we need to start respecting them and Acknowledge the fact that they are close to being an endangered species!!! We need to have much stricter regulations like tuna does and we need federal support!!!! Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:  
Support A1  
Support B1  
Support C1

TIER 2:  
Support A2  
Support B1  
Support C1

TIER 3:  
Support A2  
Support B2

TIER 4:  
Support A

4.2  
None  
Support C1, C2  
Support D2

4.4.1  
Support B

4.4.2  
Support B

4.6.2  
Support B1-a  
Support C3  
Support D2  
Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Christopher Kouimanis  
Holbrook, New York  
Email: [ckmanis@aol.com](mailto:ckmanis@aol.com)

**From:** [Daniel Andrien](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 8:20:34 PM

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Dear ASMFC,

My name is Daniel Andrien and I am from Connecticut. I am also a licensed captain and fishing guide in Long Island Sound. Since I was young, I have loved fishing for striped bass. I have seen the decline in the fishery over the years and think immediate action must be taken to protect the stock from diminishing to a point of no return. Not only is the species in danger for future generations but also in danger now for the people currently fishing for the species. I agree with the stance to the American Saltwater Guides Association, of which I am a member, on Amendment 7. Do not let politics and budget issues stand in the way of protecting this economically, socially, and environmentally beneficial species. I know there are many criticisms that data used to judge stock sizes, especially the MRIP numbers, are inaccurate. This is especially true on captains in the state of Connecticut who I personally know which are the same people denying ocean acidification and climate change. These issues are not debatable and are scientific fact. If there is an issue with the MRIP numbers then it should be addressed by the board. The council should also try to better unify the states involved in the council and share data between all states so they can make the best decisions on regulations not only for striped bass but other species shared between states. I appreciate the time you have taken to read this email and hope you will make amendment 7 favor quick and effective action against over fishing, high mortality rates, and poor management of the species.

Sincerely,  
Daniel Andrien

**From:** [Matthew Hoagland](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 8:08:41 PM

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To repeat what I said about a year ago...It's really very simple. Do what's best for the long term health of the striped bass population. It will benefit commercial and recreational fishers as well as the entire ecosystem.

Ignore the politics. Don't move the goal post to create the appearance of achieving a goal. Embrace real science.

It's really very simple.

Below are my preferences for striped bass management. If anything isn't clear, then choose what is best for the health of stripers.

#### **4.1**

Under TIER 1, I support A1, B1 and C1

Under TIER 2, I support A2, B1 and C1

Under TIER 3, I support A2 and B2

Under TIER 4, I support A.

#### **4.2**

I support None, C1, C2 and D2

#### **4.4.1**

I support B

#### **4.4.2**

I support B

#### **4.6.2**

I support B1a, C3, D2, E2

Thank you.

-- Matthew Hoagland

Plymouth, MA

From: [Kevin Howley](#)  
To: [Comments](#)  
Subject: [External] Amendment 7  
Date: Friday, April 15, 2022 8:08:25 PM

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I'm writing to express my preferences about Amendment 7 's striped bass management. For me, it's all about management for **abundance**. Without this, I don't think we have much chance at success.

I'd like to mention a couple other things before I share preferences. First, I want to thank you for the work you do. After wading through some of this material, I can't imagine the time, effort and commitment it must require. I know that we who enjoy the resource aren't often very good about expressing our gratitude, but we are grateful.

Second, I'd like to put in a plug for more reader-friendly language when addressing lay people, especially when soliciting our participation. For many of us, this feels like a second language. I'm pretty well educated and still struggled, so I suspect that there were more folks who gave up than folks who finished this process.

Anyway, here are my choices:

**TIER 1:** A1 B1 C1

**TIER 2:** A2 B1 C1

**TIER 3:** A2 B2

**TIER 4:** A 4.2 B--None C1 C2 D2 4.4.1  
B, 4.4..2 B 4.6.2 B1-a C3 D2 E2

As I say, the primary point is that **abundance matters**, rather than yield. I've fished the east coast, primarily New England, primarily for Stripers, for 60 years now. And as I thought about this process, I was flooded with memories--memories of the fish, sure, but also of the people whose lives intersect so intimately with the fish. I'd like to pass some of this along in the hopes of perhaps adding a bit to your already deep understanding--in the hopes too of underlining my thesis here: that is, millions of lives and many millions of dollars are connected to one fish--*the* fish--and that fish's survival is dependent primarily on one principle: abundance.

Anyway, I found myself considering all the people I've met directly or indirectly in this striper fishing journey, of how dependent they all were on one fish and on how that fish is managed, of the interconnections of communities and businesses and anglers. Here are some of those connections I found myself thinking about:

+ The mom and pop places and bait shops I've stopped at for supplies, pointers, conversations, maybe coffee and a donut, peopled with what my godfather used to call "characters."

+ The striper anglers' money spent at hotels, motels, B&B's, restaurants, corner shops--again, the coffee, also the sandwiches, the places to crash. Lots of good people that we striper anglers have helped support.

+ The broadened scope of our dollars. (I bet I've spent more on my striper passion than on my house.) There are, of course, thousands like me spending millions, supporting manufacturers, retailers, store owners, publishing companies, start-ups, repair shops, gas stations, guide services.

+ All that stuff: rods, reels, lines, leaders, bait, pliers, flashlights, hardware (hooks, swivels, snaps, rings) and more lures than any of us have any business owning.

+ And the clothes? Heck, we buy stuff to keep us cool, then stuff to keep us warm again, stuff to keep the wind out, then stuff to let the breezes back in, stuff to block the sun and the rain and the mosquitoes, boots and waders and wetsuits, stuff just because it has a striper logo on

it--hoodies and hats and jackets.

+ The manner of our visits. We not only visit the stores, we're all over the internet, the websites; we're attending the seminars and the large regional convention events. And these people we encounter-- whether in person or online-- they have families to support and lives that matter, all either partly or mostly dependent on one complex yet simple connection: Striped Bass.

This time and this money is not about commercial fishing; it's about recreational fishing. And on our coast, recreational fishing is about striped bass fishing. People aren't buying boats that require mortgages in order to fish for tautog. They're not planning their vacations around scup. Which brings us to the fish herself. What a terrific creature! She captivates us, and she does it in too many ways to list here. Instead, just think of the hundreds of books and DVD's, the thousands of articles and lectures, the millions of photographs. Inshore, there is nothing like her. Nothing. Not.One.Thing. She is Queen. She is Queen, and for all that she has given us, she deserves our respect and our protection.

Everything in my years along the coast--what I've seen, what my notes and journals tell me, what I've read and what I've heard from others--they all keep reinforcing the same few notions. We need to protect our oceans and everything in their food chains, and we need to understand those complex yet simple connections, connections like this one: more joy and more essential livelihoods depend on recreational fishing than commercial; inshore recreational fishing depends on striped bass; striped bass depend on numbers--**abundance**. Thanks for reading all this, and thanks again for the good work you do.

Kevin Howley

Wilton, Maine

[kevinhowley@gmail.com](mailto:kevinhowley@gmail.com)

**From:** [William Henry](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Friday, April 15, 2022 8:02:33 PM

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I live in Ocean City, NJ and have been fishing the bay and ocean for the past 9 years. I have not only witnessed but also experienced the decline in the striper population during this time. My first year striped bass fishing in the ocean my friend and I caught a large amount of striped bass via troll and jig. Over the past few years we have not only caught striper but have given up trying. Many others continue to catch bass with no repercussions "outside the 3 mile line."

Additionally, in the bay-the decline in striped bass population is overwhelmingly evident. I have witnessed people killing and keeping undersized bass without fear of enforcement. As a 25 year veteran of the NJSP, I can say that there will most definitely be chaos without enforcement. It is reminiscent of the broken glass theory in New York. If you fail to fix the broken window in abandoned houses, you will wind up fighting the fire when people set fire to the house. Take care of small problems before they become emergencies. This is what I believe we are experiencing with the striped bass population.

I believe we could use stricter regulations, more enforcement and stronger penalties. Let's save the striped bass before they are gone.

Thanks,

Bill Henry



**From:** [Kelley Shepherd](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 8:00:26 PM

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I stand with the American Saltwater Guides Association in their support for Striped Bass conservation and efforts to reduce fish mortality, rebuild the fish stock, and improve management going forward.

It is critical that we start NOW working to limit the damage done to this precious and valuable precious before it is too late!

As a recreational angler, I implore you to NOT lose sight of the value my fellow anglers and I bring to coastal communities by our pursuit of these fish (even if our families never eat them).

Listen to the guides, it's time for change in how we manage these gosh!

Kelley Shepherd

\_\_\_\_\_

Kelley Shepherd  
mkshepherdjr@gmail.com  
Arlington, Virginia

Sent from my mobile device. Please excuse any transcription or typographical oddities.

**From:** [Dan Coghlan](#)  
**To:** [Comments](#); [Joe Cimino](#); [TOM FOTE](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 7:54:45 PM

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Please maintain catch and release striped bass season through out the entire year. We do not need to keep these fish.

Allow anglers to target these fish all year, no seasonal closures. Striped bass anglers will continue to respect this fishery and educate each other, especially if catch and release rules are passed.

Thank you  
Dan Coghlan  
706 Clairmore Ave  
Lanoka Harbor NJ 08734  
215 667 9149

Sent from my iPhone

**From:** [Ethan Lucas](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 7:54:08 PM

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To whom it may concern,

My name is Ethan Lucas and am from the State of Massachusetts. I am writing to help ensure that the striped bass population is managed for a successful and timely recovery so that we don't have to continually endure boom and bust cycles.

Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

- 4.1
  - TIER 1:
    - Support A1
    - Support B1
    - Support C1
  - TIER 2:
    - Support A2
    - Support B1
    - Support C1
  - TIER 3:
    - Support A2
    - Support B2
  - TIER 4:
    - Support A
- 4.2
  - None
  - Support C1, C2
  - Support D2
- 4.4.1
  - Support B
- 4.4.2
  - Support B2-b
- 4.6.2
  - Support B1-a
  - Support C3
  - Support D2
  - Support E2

Additionally, the ASMFC should work to align catch regulations for the entire eastern seaboard. Without consistency in regulations the population of striped bass will continue be impacted on nearly all stages of their life cycle.

Lastly, the ASMFC should work to eliminate state loopholes that allow recreational fishermen to act a 'pseudo' commercial striped bass fishermen. Commercial harvest of striped bass should be relegated to those fishermen who's income (>50%) is derived from marine resource extraction (ie. fishing, clamming, etc.). Relatedly, the ASMFC should work to eliminate gillnetting as a form of commercial harvest and mandate all commercial harvest of striped bass to be rod and reel based.

Thank you for the opportunity to comment and I hope that you take the management of striped bass as seriously as I do.

Sincerely,

Ethan Lucas

Harwichport, MA  
ethanylucas@yahoo.com

**From:** [Bonnie](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 7:51:46 PM

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Hello,

My name is Kevin Wiggin, and I live in NH on the sea coast. I have lived here most of my life, and have fished for striped bass off and on for many years. I have seen the ebbs and flows over the years and it is finally time to speak up for the bass.

Please do whatever you can to make sure the strongest measures are taken, with the quickest timeline for data gathering, and in turn policy updates to protect the fish. We need to enact broader measures to protect bass. Conservation Equivalencies should not be used when bass are overfished. CEs are hard to justify when data shows they fail time and time again. Data can be manipulated easily to show something should work, but with CEs we know they do not work.

We also should not take a few single years of good spawns to show that this is expected to keep happening. The more conservative spawn numbers gathered as of late should be the norm for modern management. I believe the term is Low Recruitment Standard, and utilizing this will help the fishery recover and sustain itself.

I also strongly disagree with the effectiveness of seasonal closures in regards to reducing stirrer mortality. Fish do not always spawn at the same time, and often times these closures do not have the overall reduction desired, or proclaimed to be possible. Along the same lines we should react as quickly as possible to the. Latest data especially in regards to being more conservative. When in doubt we should assume more protection is better than less.

I hope to not see a closure like we had in the 80s. I will be watching your decisions as they come this spring, and thank you for listening to our voice in this. Please make sure we do everything possible to ensure we always have big bass.

Thanks,  
Kevin Wiggin

Sent from my iPad

**From:** [George R Burns](#)  
**To:** [Comments](#)  
**Subject:** [External]  
**Date:** Friday, April 15, 2022 7:47:23 PM

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We have been enjoying great spring and fall striper fishing Leave it ALONE

**From:** [Megan Dowdell](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [Michael Armstrong](#); [Dan Mckiernan](#); [Rep. Sarah K. Peake](#); [RAY@capecodfisherman.org](mailto:RAY@capecodfisherman.org); [RICK JACOBSON](#)  
**Subject:** [External] "Amendment 7"  
**Date:** Friday, April 15, 2022 7:44:35 PM

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To the ASMFC

My name is Megan Dowdell. I live in Weymouth MA. I am responding to the request for public comments on Amendment Seven for the management of striped bass.

I feel the striped bass stock has reached a dangerous low and proactive measures need to be taken.

Here are my choices for each proposed regulation.

4.1

Tier 1

A1

B1

C1

Tier 2

A2

B1

C1

Tier 3

A2

B2

Tier 4

A

4.2

B- None

C1, C2

D2

4.4.1

B

4.4.2

B

4.6.2

B1-a

C3

D2

E2

Please make the right decision and choose to end overfishing and manage striped bass for abundance.

Thank you

Megan



**From:** [Zark Strasburger](#)  
**To:** [Comments](#); [Dan Mckiernan](#); [Raymond Kane](#); [Sarah.Peake@mahouse.gov](#); [Sarah Ferrara](#); [Jason E. Mcnamee](#); [DAVID BORDEN](#); [Sen. Susan Sosnowski](#); [Eric Reid](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 7:36:40 PM

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Dear ASMFC,

My name is Peter "Zark" Strasburger and I am a resident of the state of Massachusetts and a homeowner in Rhode Island. Striped bass are important to me because my primary form of Spring, Summer, and Fall recreation is saltwater inshore fishing from Sakonnet to Fall River to Westport to Woods Hole to Cuttyhunk to Point Judith. My father passed on the tradition of sport fishing to me as a small kid. Many of my fondest memories of my father relate to time on the water together chasing fish. By far dad's favorite fish were big striped bass. They were epic in his mind and his stories.

I've seen fish stocks dwindle clearly myself since being a kid on Cuttyhunk in the 1970s. I put in hundreds of hours on the water each year. I can still readily find many tiny stripers, but keepers have become more and more of a rarity. That tells me clearly that we are doing something wrong. We are clearly overfishing. We are not respecting the gifts nature has shared with us. Fish stock management rules and regulations are not keeping up.

I want my son's daughters and sons and grandchildren to be able to experience the joy, thrill, and challenge of fishing, catching, cleaning and eating the wonderful fish species that were long plentiful along our shores. To reach the goals of rebuilding fish stocks so that all of us can enjoy the beauty, sport, self-confidence, and valuable nutrition that come from striped bass fishing for many generations to come, I urge the ASMFC to take swift action to adopt regulations that rebuild striper stocks to the levels of decades, or better yet, centuries ago.

Please adopt regulations that are as aggressive as possible in terms of speeding up biomass regeneration to truly sustainable levels, and adopting regulations that help us collectively stay above target levels by all means necessary.

Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2  
None  
Support C1, C2  
Support D2

4.4.1  
Support B

4.4.2  
Support B

4.6.2  
Support B1-a  
Support C3  
Support D2  
Support E2

Thank you for the opportunity to comment. I hope that my voice will be heard. I hope your actions and decisions can quickly bring our behavior back into balance with the striped bass we love

Sincerely,  
Zark (Peter) Strasburger

Concord, MA  
[strazbot@gmail.com](mailto:strazbot@gmail.com)

--

**Zark Strasburger**  
Creative . Strategy  
901-494-7234

[UpWork](#) | [LinkedIn](#) | [Projects](#)

**From:** [zach bob](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 7:32:45 PM

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Hello,

My name is Zach Wiggin, and I Wanted to voice my opinion regarding Draft Amendment 7. I am a new striper fisherman, but a long time fisherman. The last 4 years I have gotten more, and more into striper fishing and fishing the salt in general. It is a very different world then the freshwater lakes and streams I am used to.

Last year I caught more striped bass then ever before. I started fly fishing for them, and was finally able to put some of the knowledge I had learned in the past few years and turned it into some success. The highlight was going fishing on a boat with a new friend I met striper fishing. We caught a dozen fish that morning, and I was floored. That being said I have become more and more concerned about the future of the fishery. My friend had fished for bass in New Hampshire's Great Bay for a dozen plus years, and fished NY's waters before that. What to me seemed like amazing fishing he told me was just a shadow of what it had been, and should be. He was very concerned and seemed to be a reasonable man to me. However, Being a skeptical person by nature I had to dig in and gather as much info as I could. My opinions have evoked in the past 9 months, but I want to write you to try and lobby for the striped bass who cannot speak for themselves.

I am fully in favor of removing Conservation Equivilancies when striped bass are overfished. Certain states abuse this, and it is hurting the fish. I fully support NO CE's permitted when striped bass are overfished. The data used in CE proposals must meet the federal standard of 30 Percent Standard Error or less. Anything else is just asking for trouble. We need a 25% Uncertainty Buffer (front-end margin of error) built into any CE. This way if a state chooses to utilize CEs there is actually a chance that there will be a reduction in other areas.

Catch and release areas, and times do not work to reduce bass mortality. The priority has to be on keeping healthy adult fish in the system for many years, and in turn upping the chances of successful juvenile recruitment. Triggers for controls, and closures to protect the fish need to be enacted as quickly as possible. Too often we have let bass who we know are overfished continue to be overfished.

Hopefully we have many new fisherman joining the pursuit of striped bass in the next few years. The time to take action to protect fish is now. I hope to see conservative actions taken, and to see many more bass for people to enjoy, and to make more bass. I hope you will take action as necessary, and look forward to letting science, open discourse, and the fishery as a whole win out over a few greedy individuals.

Thanks,  
Zachary Wiggin

[Sent from Yahoo Mail for iPhone](#)

**From:** [Evan Priovolos](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7 Comments  
**Date:** Friday, April 15, 2022 7:31:20 PM

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Hello, my name is Evan Priovolos.

Striped bass fishing is my passion. I spend a lot of money in several different states each year to fish recreationally for them. I am strictly a catch and release fisherman for striped bass.

A healthy striped bass population is important for everyone who fishes for them. It is and has been apparent that striped bass are overfished and the availability of fish has gone down severely. There is an alarm sounding as we speak and the call needs to be answered immediately. All hands need to be on deck, sacrifices need to be made, and the sacrifices need to be FAIR across the board. If this doesn't happen, ASMFC's best comeback story will be negated and forgotten. Do not make fools out of yourselves, do the right thing!

I support:

4.1

Tier 1

A1

B1

C1

Tier 2

A2

B1

C1

Tier 3

A2

B2

Tier 4

A

4.2

Rec release mortality

B2-a

C1, C2

D1

4.4

Rebuilding plan

B

B

4.6.2

Equivalency

B1-a, B1-c

D2

E2

Thank you

Evan Priovolos

Sent from my iPhone

**From:** [paulwplu@gmail.com](mailto:paulwplu@gmail.com)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 7:28:20 PM

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I am 64 years and have been saltwater fishing my entire life. I would like to see an end to the commercial fishing of stripped bass, and a one fish per day of 36 inches or larger for recreational fisherman. Also with the state of stripped bass right now I would like to see a complete closure of stripped bass fishing for five years to rebuild the stock.  
Thank you

Sent from my iPhone

**From:** [Scott Mackie](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 7:25:02 PM

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To whom it may concern,

I'm a 42 year old striped bass fisherman residing in Stamford, CT.

The striped bass fishing continues on its downward spiral. Haven't we learned from our past mistakes? I beg of you to intervene. Please institute a moratorium on keeping fish, it was the only way the stock rebounded in the 1990's. It's unfortunate that we need to take such drastic measures, but here we are again.

Honestly, I sold my boat last year, as I've watched the striped bass stock plummet. All of our technology has improved, yet, experienced fishermen/women are reporting catching less bass- both recreationally and commercially.

In lieu of a complete moratorium until the stock rebounds, here are my thoughts outlined below which I share with the Strippers Forever (SF) Organization.

Thanks for taking the time to listen. Our action know will preserve the future of the fishery.

## 4.1 Management Triggers

### **TIER 1 OPTIONS: Fishing Mortality (F) Triggers**

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– Option A: Timeline to Reduce F to the Target– SF supports [Sub-option A1 \(status quo\): Reduce F to a level that is at or below the target within one year](#).

- Reasoning: We believe that wherever possible the board should move as quickly as possible to reduce fishing mortality. Sub-option A1 offers the shortest timeframe to get it back below the target.

–Option B: F Threshold Triggers– SF supports [Sub-option B1 \(status quo\): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.](#)

- Reasoning: Best of the two sub-options, action will not be taken under B2 unless a two year average of F exceeds the F threshold.

–Option C: F Target Triggers– SF supports [Sub-option C1 \(status quo\): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.](#)

- Reasoning: Best of the three sub options in regards to action trigger in the least amount of time. C2 requires 3 years of F exceeding F target and C3 has no trigger related to F target.

### **TIER 2 OPTIONS: Female Spawning Stock Biomass (SSB) Management Triggers**

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–Option A: Deadline to Implement a Rebuilding Plan– SF supports [Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board](#)

formally reviews and accepts, if necessary, the results of the relevant stock assessment.

- Reasoning: This option puts in place a two-year deadline to implement a rebuilding plan. A1 (status quo) does not put in place a deadline to implement a rebuilding plan.

–Option B: SSB Threshold Trigger– SF supports Sub-option B1 (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

- Reasoning: B2 offers no trigger related to the female SSB threshold. We believe that while an F trigger would likely be in place it is also important to keep an eye on and take corrective measures if the female SSB is in trouble.

–Option C: SSB Target Trigger– SF supports Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

- Reasoning: Again, C1 offers the shortest time frame to rebuilding if the female SSB falls below the target. C2 requires 3 consecutive years and C3 contains no management trigger related to the female SSB target.

### **TIER 3 OPTIONS: Recruitment Triggers**

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–Option A: Recruitment Trigger Definition– SF supports Sub-option A3: The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model (NY, NJ, MD, VA) shows an index value that is below the median of all values in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years. The high recruitment reference period used for this trigger may be adjusted as recommended by the TC during benchmark stock assessments. This trigger alternative has a higher sensitivity than both the status quo trigger and sub-option A2 (Figure 1). This trigger alternative would have tripped six times since 2003: NY in 2006; MD in 2008; MD in 2009; MD and VA in 2010; NY in 2013; MD in 2014 (Table 2).

- Reasoning: The status quo (current trigger) has only been tripped once in the time period between 2003-2020, clearly it is not sensitive enough based on where the stock is currently at. A2 would have tripped the trigger 3 times in that same time period. A3, while classified as a “high sensitivity trigger”, would have tripped the trigger 6 times in that same time frame. As with the other options supported, we believe the board needs to operate with more caution moving forward, being aware of and addressing years of low recruitment ASAP.

–Option B: Management Response to Recruitment Trigger– SF supports Sub-option B2. If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

- Reasoning: In the past, the board has failed to adjust F to account for both good and bad year classes (recruitment). With several recent years of poor year classes we need the board to be more responsive to these shifts. B2 puts an interim F target adjustment in place if the recruitment trigger is tripped.

### **TIER 4 OPTIONS: Deferred Management Action**

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–SF supports Option A (status quo): No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

- Reasoning: We cannot support any options which allow the board to defer action if a management



trigger is tripped. Options B-F all allow for deferred action by the board in the event of a management trigger. Given where the stock is currently at, overfished with overfishing occurring, the “Board’s concern about the frequent need for management action due to triggers tripping with each stock assessment update or benchmark” is quite frankly, absurd. Stock assessments are typically conducted every 2 years (COVID delayed the last one) and benchmark assessments every 5 years. If the board needs to convene and take action more frequently to maintain a healthy stock then so be it.

## 4.2 Recreational Fishery Management Measures

### Option B. Effort Controls (Seasonal Closures)

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-SF supports [Sub-option B2. Spawning Area Closures](#): The Board can select either or both of the following sub-options B2-a and B2-b. Multiple states currently have spawning closures in place with closure boundaries defined by those states. Existing spawning closures would be applied toward meeting the requirements of the selected option(s).<sup>15</sup> Spawning area closures during the spawning season could contribute to stock rebuilding by eliminating harvest and/or reducing releases of spawning and pre-spawn fish. Reducing releases during this time is particularly important to reduce stress and injury to fish as they move into lower salinity spawning areas. If new information on the timing of striped bass spawning is available in the future, the TC would conduct a review of that research and recommend changes to the timing of spawning closures if needed. If this option is selected, CE would not be permitted.

-SF supports [Sub-option B2-b. No-Targeting Spawning Closure Required](#): All recreational targeting of striped bass would be prohibited for a minimum two-week period on all spawning grounds (not necessarily the entire spawning area) during Wave 2 (March-April) or Wave 3 (May-June), as determined by states to align with peak spawning. States will determine the boundaries of spawning ground closures. Closures prohibiting recreational targeting on spawning grounds have already been implemented in Maine (Kennebec River), New Jersey (Delaware River), and Maryland (Chesapeake Bay) during part of Wave 2 and/or Wave 3 (Figure 4).

■ Reasoning: This is an important one! And while this is a complex section of Amendment 7 we believe it is vital to the recovery of the SSB and stock as a whole. Sub-option b2-a would prohibit harvest but allow for catch and release, b2-b would be a no targeting closure and would provide the best protection for the SSB while they spawn. The option is somewhat open ended with the language calling for a “minimum two-week period,” we would like to see it closer to a four or six week period in order to see the best results and gain the most protection for the SSB. Many other species benefit from shortened seasons or spawning closures and Striped Bass should as well. Considering the stock is currently overfished with overfishing occurring, the least we can do is allow for uninterrupted spawning. The argument that Striped Bass would be a bycatch while fishing for Bluefish or other species is mostly null as Bluefish do not show up in great numbers until after this timeframe. The uncertainty regarding these options surround the definition of the spawning areas and the possibility that states may need to work together to provide the most amount of protection for the SSB as they stage ahead of the spawn and then move up into the river to do so. The best example of this is the case of the Hudson River where fish stage in Raritan Bay, New Jersey before ascending the Hudson River to spawn in NY. In a best case scenario this targeting closure would not only protect the spawning grounds but also the areas in which the SSB congregates prior to spawning, they go hand in hand. Despite these uncertainties we support these options with the hope that the TC and board will work together to develop these areas. Overall these options err on the side of caution but with the Striped Bass SSB and stock as a whole being in such a dire situation, we believe any gain, no matter how big is worth the risk involved.

### Option C. Additional Gear Restrictions

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-SF supports [Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.](#)

-SF supports [Sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.](#)

- Reasoning: These options are a no brainer. Let's prevent the use of gaffs for removing fish from the water in the event that they would need to be released as slot limits require more fish to be released. C2 would require non circle hooked fish (J-hook when fishing for other species) to be returned to the water as soon as possible and with careful handling. Both of these measures combat recreational release mortality which has been determined to have a large effect on F.

#### **Option D. Outreach and Education**

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-SF supports [Sub-option D1: States would be required to promote best striped bass handling and release practices by developing public education and outreach campaigns. States must provide updates on public education and outreach efforts in annual state compliance reports.](#)

- Reasoning: Another easy option. States collect license fees and we believe some of that money should be spent on angler education and more specifically catch and release best practices. Option D2 only *recommends* that "states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns." We believe that this should not just be a recommendation but a requirement. Angler education is an essential method to help curb recreational release mortality and ultimately help rebuild the stock to abundance.

### **4.4 REBUILDING PLAN**

#### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

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-SF supports [Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.](#)

- Reasoning: As we have mentioned, young of year over the past 3 years has been well below average. Combine this with the fact that Addendum 6 only addressed mortality and not rebuilding the stock and now we are in a terrible spot. The writing has been on the wall for years, if you were on the water it was clear that the stock was in trouble. Option B bases the rebuild of the SSB on the 'low recruitment regime assumption,' more in line with the poor year classes previously mentioned. It would likely achieve a lower level of removals and require more restrictive management measures.

#### **4.4.2 Rebuilding Plan Framework**

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-SF supports [Option B: If the 2022 stock assessment results indicate the Amendment 7 measures have less than a 50% probability of rebuilding the stock by 2029 \(as calculated using the recruitment assumption specified in Amendment 7\) 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.](#)

- Reasoning: A new stock assessment will be published in October 2022 and depending on the outcome it may have a massive impact on the measures being put in place by Amendment 7. It is an unfortunate situation and likely could have been avoided if the board took action sooner but it is a concession we should be willing to make to prevent a further delay in developing and putting into action an addendum to Amendment 7. As noted it appears the board is willing to allow some sort of public involvement in the process. "Under this option, public comment could be provided during Board meetings per the Commission's guidelines for public comment at Board meetings, and/or public comment could be provided in writing to the Board per the Commission's timeline for submission of written public comments prior to Board meetings."

### **4.6 ALTERNATIVE STATE MANAGEMENT REGIMES**

#### **4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option B. Restrict the Use of Conservation Equivalency Based on Stock Status**

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-SF supports [Sub-option B1. Restrictions: CE programs would not be approved when Sub-option B1-a: the](#)

stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

- Reasoning: While we were hoping to see conservation equivalency completely removed from the management process, that is not an option within Amendment 7. The TC has stated that the implementation of CE in the management process is unquantifiable and will likely cloud the regulations put in place by states to reach the overall reductions necessary. Option B, sub-option B1 provides the most limitations to the use of CE by states, some of whom have taken advantage of it. The stock needs to be managed for abundance and therefore we need to let the Commission know that CE has no place in a stock that is overfished with overfishing occurring. If you only choose to speak on or select a few options from A7, this should certainly be one of them.

#### **4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

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-SF supports [Sub-option C3: CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30.](#)

- Reasoning: This is the most conservative option available as as stated in Amendment 7 “NMFS warns that “[MRIP] Estimates should be viewed with increasing caution as PSEs increase beyond 30. Large PSEs—those above 50—indicate high variability around the estimate and therefore low precision.”. We want to make sure the CE is only accessible if tightest estimate and least amount of risk.

#### **4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

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-SF supports [Sub-option D3: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 50%.](#)

- Reasoning: An uncertainty buffer refers to the previously mentioned unquantifiable results of states putting CE in place as pointed out by the TC. What this means in simple terms is, if a state wants to make use of CE they will need to plan for a buffer to account for possible overages of F. In other words it could be thought of as a tax for using CE. This will hopefully discourage states from using CE in the first place. We would like to see the biggest buffer possible (50%) put in place to dissuade states from trying to use CE. If they do opt to use it the 50% buffer would hopefully counteract the potential overages in F.

#### **4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

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-SF supports [Sub-option E2: Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state-specific level.](#)

- Reasoning: This is a bit convoluted but the bottom line is that this essentially undoes an unfortunate series of events that transpired during the addendum 6 process. New Jersey felt that the coastwide 18.5% reduction based on harvest was unfair as it translated to a larger reduction for them due to the complication of the slot limit. The board sided with New Jersey who then ultimately failed to meet its goals and in the end took no reduction.

■

Scott Mackie  
617-851-9073

**From:** [Gavin Fraser](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 plea: be bold  
**Date:** Friday, April 15, 2022 7:20:54 PM

---

Hello ASMFC, if Captain McMurray is still involved on the board please say hello for me, I have been out with him more than a few times as a recreational fisherman casting for stripers.

I would encourage the ASMFC to take the strictest possible measures, up to and including completely shutting down striped bass fishing for both commercial and recreational purposes for a year or more in order to rebuild the stock. Generations that come after us will thank us for taking these types of extreme but necessary measures.

Assuming that is reaching too far given the politics, please consider severely restricting both sides, and take whatever measures are necessary. I have pasted some position statements from a reputable source below, I must admit I do not know the intricacies of the issues, but I do know from over 50 years of fishing recreationally in the northeast that the striped bass stock is severely depleted. No argument there.

**Please make historic changes, be bold. Even if it means I can't fish for stripers for a year or two, that's a very very small price to pay.**

Regards,

Gavin

Gavin Fraser  
Chief Executive Officer  
Small Planet  
[smallplanet.com](http://smallplanet.com)

Management Triggers:

Fishing Mortality Triggers:

Timeline to Reduce F to the Target, I support Sub-option A1 (status quo) 1 year.

F Threshold Trigger, I support Sub-option B1 (status quo) If F exceeds the threshold in a single year, action must occur to reduce F to the target within timeframe selected under sub-option A (supported A1 above).

F Target Trigger, Support Sub-option C1 (status quo) if F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, must reduce F to a level that is at or below the target within the timeframe selected under sub-option A (supported A1 above).

Spawning Stock Biomass Triggers

Deadline to Implement a Rebuilding Plan, I support Sub-Option A2: Two-Year Deadline

SSB Threshold Trigger, I support Sub-option B1 (status quo) Rebuild when SSB in a single year falls below the threshold.

SSB Target Triggers, I support Sub-option C3. No management trigger related to SSB target because F target trigger also has an SSB target component and managers directly control F.

Recruitment Triggers

Recruitment Trigger Definition, I support Sub-option A2: Moderate Sensitivity Recruitment Trigger.

Management Response to Recruitment Trigger, I support a variation of Sub-option B2. The Board use an interim F target calculated using the low recruitment assumption and then during the next stock assessment it evaluates F against the new interim F target and simultaneously evaluates all the other management triggers to determine if action is needed.

Deferred Management Action, I support Option A. No deferred management action. Stock assessments following a management change should be scheduled to enable evaluation of two fishing years under the new management measures providing an opportunity for the population to react to the corrective management action while creating management stability for at least two years.

Measures to Address Recreational Release Mortality

Seasonal closures, I support Sub-options B2 Spawning Area Closures.

Gear restrictions, I support Sub-options C1 and C2.

Outreach and Education, I support Sub-option D1. States are required to promote best striped bass handling and release practices by developing campaigns.

Recruitment Assumption for Rebuilding Calculation, I support Option B. Use a low recruitment assumption for the 2022 stock assessment.

Rebuilding Plan Framework, I support Option B. Enable ASMFC to respond quickly through Board action.

Management Program Equivalency, I support Sub-options B1-A and B1-C, C3, and D1.

Thank you for the opportunity for allowing me to share my thoughts on this important issue

**From:** [Brian Ibanez](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 7:10:23 PM

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Hi,

My name is Brian Ibanez and I am an angler in Connecticut and I have been fishing the saltwater for Striped Bass since 2012. I have a 4 year old son who's grandchildren,I hope, will be able to enjoy the resource.

I do not have the time nor expertise to dissect Amendment 7, but I would like to indicate that I am in strong support of regulations designed to limit the harvesting of Striped Bass for recreational and commercial use to preserve the species. I would be supportive of a complete moratorium on Striped Bass harvest for any reason other than scientific research.

Now is the time to stand up and make aggressive changes to protect the fishery we love. I hope you will do the right thing.

Best regards,

Brian Ibanez  
301-646-5050









**From:** [Richard Pombriant](#)  
**To:** [Comments](#)  
**Subject:** [External] Striper  
**Date:** Friday, April 15, 2022 6:52:59 PM

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I endorse all measures to limit catch and release mortality save some fish and limit all commercial fishing for the near future

Sent from my iPhone

**From:** [Charlie Engh](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 6:52:25 PM

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Hello,

My name is Charlie, I am a lifelong Virginia resident who has spent as much time as possible fishing the Virginia and Maryland sections of the Chesapeake Bay. It is my hope by supporting Draft Amendment 7 we can preserve the striped bass population so that when I have kids they will be able to enjoy the amazing and unique fishery as I have.

Specifically In terms of Management triggers I support the fastest timeline to reduce fishing mortality rate to below target by one year (sub-option A1 of 4.1). I also feel strongly that there by no ability to defer management if any of the defined triggers are met. I am also in favor of further protection of spawning areas with closure of seasoned per sub option B2 and B2-b of 4.2. The restriction of the use of the conservation equivalency is also very important to me. For 4.6.2 I support sub option B1 as it is best fit to try and reduce states ability to take advantage for e conservation equivalency and use it in a way that it was not intended.

Protecting these fish is the best and only option and I hope it can be done in an effective and efficient manner.

-Charlie

**From:** [Hunter Boll](#)  
**To:** [Comments](#)  
**Subject:** [External]  
**Date:** Friday, April 15, 2022 6:35:59 PM

---

I am writing you to express my whole hearted support for amendment

Sent from my iPhone

**From:** [Vincent Fraccalvieri](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 6:32:10 PM

---

I am a longtime recreational striped bass fisherman and offer the following public comment on the options presented in Draft Amendment 7. My personal experience and review of available the available science indicates that the striped bass fishery is severely depleted. I believe there is a dire need for change in management to increase conservation quickly.

For nearly two decades there has been a steady decline in the striped bass stocks and it is reflected in the data. This is corroborated by what is being seen by fisherman on the water regardless of state. It is frustrating and deeply troubling that a successfully rebuilt fishery is being decimated once again. Without strict and prompt measures back by science, I am certain we will have lost the opportunity to preserve the fishery for generations to come.

I personally endorse the following guidelines:

#### 4.1 Management Triggers

##### Tier 1- Fishing Mortality Management Triggers

Option A1

Option B1

Option C1

##### Tier 2- Female SSB Management Triggers

Option A2

Option B1

Option C1

##### Tier 3- Recruitment Triggers

Option A3

Option B2

##### Tier 4- Deferred Management Action

Option A

#### 4.2.2 Recreational Release Mortality

Option B2-b

Option C1/C2

Option D1

#### 4.4.1 Rebuilding Plan

Option B

#### 4.4.2 Rebuilding Plan Framework

Option B

#### 4.6.2 Equivalency

Sub-Option B1a/B1c

Sub-Option C3

Sub-Option D3

Sub-Option E2

I thank you sincerely for your time and consideration in the matter.

Regards,

Vincent Fraccalvieri



**From:** [william.martin](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7 Input - CCA  
**Date:** Friday, April 15, 2022 6:29:58 PM

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Dear managers of the wonderful striped bass. I have fished for striped bass for 65 years, over good seasons and bad though I stopped fishing during the worst times of population declines.. I have seen repeated failures among the states to effectively manage the systemwide stock over that time, and I saw that it required threats of Federal action and lawsuits to prevent further drastic declines in the past century. I am sad to see that we have again reached the point where almost everyone with interest in the stock recognizes finally what many saw years ago that the spawning stock and large mature striped bass were again in critical condition.

I appreciate that the ASMFC is considering multiple solutions and has asked for input from various constituencies. My opinions can be summarized quickly: first, increase the number of large breeding female striped bass by significantly limiting their catch. That includes ending the "trophy season" in Maryland plus instituting firm and firmly enforced slot systems in MA, RI and CT. Second, materially increase law enforcement of illegal out of season harvests in Maryland during the winter. This illegal commercial harvest, particularly in Tilghman Island, is again under most management and enforcement radars but has enormous effect upon harvest of large prespawm females. Third, monitor both the commercial and recreational fishermen in New England who hid fish illegally in their boats and also fish multiple trips daily, recording on the catch from one trip, Fourth, until the population of all sized striped bass recovers, limit summer fishing even for smaller stripers during times when the water temperature is mortally dangerous for the survival of striped bass. Two weeks of closure, particularly in MD and NC, has minimal effect especially when any conservation officer can watch charter boats culling small fish in the hundreds simply by following the line of dead discards up the Chesapeake Bay to Kent County during the month of July and August

Specifically regarding the proposals under consideration, I recognize how much effort finally has gone into ASMFC obtaining input from all constituencies. Clearly, your group is trying to please everyone but the situation is too critical to take minimal steps. Every constituent member must shoulder their part of the effort to rebuild the stock. My own pessimistic opinions are that there will be too much cheating among the various constituencies to make a material change, but you and all of us must try.

I favor the following policies and decisions:

RE Amendment 7, 4.1 I favor the following:

Tier 1: A1, B1 and C1

Tier 2: A2, B1 and C3

Tier 3: Suboption A2, B2

Tier 4: Options A and F

RE 4.2 I favor recruitment triggers A2 and B2

RE 4.41 Recruitment assumption Option Am B2-a and D1

RE 4.42 Rebuilding Plan Framework Option B

RE: 4.62 Management Program Equivalency i favor Option B1A and B1C plus C3 and D1.

Everyone has to make a serious effort to conserve the overall stock and especially the large breeding females. I do my part and refrain from fishing in dangerously warm water and from taking large or even medium sized breeding females. After all, scientific studies suggest that eating large striped bass is strongly discouraged for pregnant women and young children. What does that say about our effectiveness at protecting this marvelous fish from environmental harm. A few respectable scientists believe they are so toxic that no one should eat any stripers at all until the water is free from airborne mercury and other toxins entering the Chesapeake Bay. What a shame that my grandson cannot safely eat the official fish that is on the Great Seal of Maryland.

It is time for bold action by ASMFC! Please take the long view and think of your grandchildren as you must take inevitably unpopular positions.

William M. Martin  
20 Aintree Road  
Towson MD 21286

**From:** [Jeff C](#)  
**To:** [Comments](#)  
**Cc:** [James Gilmore](#); [Emerson Hasbrouck](#); [Sen. TODD KAMINSKY](#)  
**Subject:** [External] Draft Amendment 7 Comments  
**Date:** Friday, April 15, 2022 6:26:49 PM

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Dear Commissioners:

My name is Jeff Carson, I live in Pelham, NY, and I am writing to submit my comments on the proposed striped bass Amendment 7. As an avid fly-fisherman and surfcaster, as well as someone who loves spending time on the water fishing with my kids and my friends, this fishery is incredibly important to me. I am also friends with a lot of folks who make their living off the local waters, whether they are tackle shop owners in Westchester, the Bronx, or LI, or guides that work out of these areas.

As such, it's tremendously important to me that we preserve this fishery not just for current stakeholders (such as recreational anglers like myself along with the guides and business owners), but for future generations as well. I have committed myself to learning more, which includes recently completing an Introductory Fisheries Science for Stakeholders course through the Rutgers University Cooperative Extension.

I was startled by the recruitment numbers over the past three years; I believe that the Commission needs to act swiftly and decisively to take the necessary steps to help the fishery recover from these levels. This is primarily a catch-and-release fishery and, accordingly, it needs to be managed with the needs of recreational anglers (and those who make their living off of recreational anglers) in mind. I would like to see the Commission take a science-based approach and make the appropriate decisions to manage this fishery for abundance, not yield.

My recommendations are below. I sincerely appreciate the opportunity to comment on Draft Amendment 7!

#### **4.1**

##### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

##### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

##### **Tier 3**

Option A- Support A2

Option B- Support B2

##### **Tier 4**

Support A



## **4.2**

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D2

### **4.4.1**

Support Option B

### **4.4.2**

Support Option B

### **4.6.2**

Option B- Support B1-a

Option C- Support C3

Option D- Support D3

Option E- Support E2

Best,

Jeff Carson

303.915.0730

**From:** [Ben Fleve-craft](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 6:19:43 PM

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Hi,

As a life-long passionate fisherman and newly minted fishing guide who plans on operating charter fishing as a full-time job, it is imperative that we have an abundant Striped Bass stock for decades and decades to come. I support the most conservative regulations proposed and believe worst case scenario assessments should potentially trigger a moratorium if deemed necessary by the marine biology community. Its plain and simple - these fish are worth more alive than they are dead.

I believe it is a fallacy that charter fishermen and headboats require Striped Bass to be killed and cleaned at the dock to promote their business. I caught hundreds of striped bass including slot size and over slot size and safely released every single one of them. For those fishermen who want to keep a fish occasionally as table fare, I am in favor of increasing the slot size to 36" - 40" in order to ensure that smaller, more abundant year classes have greater chances of spawning at least 1-2 years.

Thank you for respecting the publics comments.

Ben Burdine  
203-394-7777

**From:** [Diego Rodriguez](#)  
**To:** [Comments](#)  
**Subject:** [External] Comment for Amendment 7  
**Date:** Friday, April 15, 2022 6:13:35 PM

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My name is Diego Rodriguez and I am an avid surfcaster from the state of Connecticut. The Atlantic Striped Bass fishery is an important resource that needs to be conserved for ALL future generations. It represents boundless excitement as a target species for recreational anglers as well as an opportunity to bring home a delicious meal from your costal fishing trip. The pursuit of this migratory king supports a vast amount of local merchants from Maine to Cape Cod, from Long Island to the Jersey Shore down to the Chesapeake. The collapse of this fishery would be catastrophic for the coastal economies of the North East not to mention the many other species whose success are inextricably intertwined with the success of the Atlantic Striped Bass. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:  
Support A1  
Support B1  
Support C1

TIER 2:  
Support A2  
Support B1  
Support C1

TIER 3:  
Support A2  
Support B2

TIER 4:  
Support A

4.2  
None  
Support C1, C2  
Support D2

4.4.1  
Support B

4.4.2  
Support B

4.6.2  
Support B1-a  
Support C3  
Support D2  
Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Diego Rodriguez  
Guilford, Connecticut  
Email: [fortyneck@yahoo.com](mailto:fortyneck@yahoo.com)

-Diego R.

**From:** [Taylor Hoyt](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [Sen. Craig A. Miner](#); [ROBERT LAFRANCE](#); [Rep. Melissa Ziobron](#); [Justin Davis](#); [WILLIAM HYATT](#)  
**Subject:** [External] Atlantic Striped Bass -Amendment 7 Public Comment  
**Date:** Friday, April 15, 2022 6:13:07 PM

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Good Afternoon Emile Franke & all those CC'd on this important "public comment for "The Atlantic Striped Bass Amendment 7."

I will keep this brief. Just please know that I appreciate the hard work that you all put in on behalf your average citizen like myself. Public service is a noble pursuit and unfortunately can get much maligned. Everyone has their own opinions and agendas and trying to come to an agreement or find the middle ground can be a daunting task. I thank you for your efforts even though I may not always agree with the outcome.

I've been an avid fisherman for Atlantic Striped Bass for over 40 years. I'm also a firm believer in preserving and protecting the environment and the ecosystems that the Striped Bass and other fish occupy.

I fish almost entirely for sport and practice catch & release. In all my years of fishing for Striped Bass I've kept less than 10 fish. To me there are better eating fish available and the Striped Bass is just to important and fragile a species to take for my own.

While I was completely for an all out moratorium of Atlantic Striped Bass I understand some of the reasons why that was struck down.

In place of that I would like to submit my support for the following options:

4.1

Tier 1

Option A- Support A1

Option B- Support B1

Option C- Support C1

Tier 2

Option A- Support A2

Option B- Support B1

Option C- Support C1

Tier 3

Option A- Support A2

Option B- Support B2

Tier 4

Support A

4.2

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Option B- Support B1-a

Option C- Support C3

Option D- Support D2

Option E- Support E2

I sincerely appreciate the opportunity to provide my comments. I also really hope that you capitalize on this moment and opportunity to restore the Atlantic Striped Bass population and maintain it for future generations.

We've all got a massive responsibility to do what is ethically right for us, future generations, but also the Atlantic Striped Bass.

This is not a light moment. This is a moment to make an impact. This is where you can save a species that is literally teetering on the brink of total collapse. This is a moment where you can sit back and say to yourself that I made a difference. This is why I got into public service- to make a difference. Doing everything possible to protect the Atlantic Striped Bass makes a difference for all of us and the fish.

Again, thank you for the opportunity to voice my comments.

Sincerely,

R. Taylor Hoyt

**From:** [Sam Herzig](#)  
**To:** [Comments](#)  
**Subject:** [External] Please Read: Public Comments on options in current Amendment 7 Draft  
**Date:** Friday, April 15, 2022 6:05:59 PM

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To the Advisors and Board members of the Atlantic States Marine Fisheries Commission:

My name is Sam Herzig and I am an avid angler born, raised and living in New York. I have been fishing these waters with my father since I was knee high to a grasshopper, both on fly and spin. Striped Bass fishing is a passion of mine that I dream about passing on to my kids and others in the future. For that reason, it is clear that the population needs to be managed for abundance and health. Protecting striped bass stocks, safeguarding the recreational angling industry that relies on these fish, and ensuring that future generations of anglers can enjoy catching our coastal fishery are paramount. Please consider this notice that I wish to support the following options in the current Amendment 7 draft:

On 4.1 Management Triggers, I support:

- Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality
- Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold
- Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions
- Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, I support:

- Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method
- Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, I support:

- Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. We recognize this option may require more restrictive management measures than option A, which I support

On 4.4.2 Rebuilding Plan Framework, I support:

- Option B to allow the Board to take direct management actions as well as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, “Management program equivalency (also known as “conservation equivalency” or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

I believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically, I support:

- Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level
- Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates
- Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries
- Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

Thank you for the work you are doing and the opportunity to comment on Amendment 7. I look forward to learning the outcome of the upcoming stock assessment and to reading the final version of the Amendment.

Best Regards,

Sam Herzig



**From:** [Elix deJesus](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7. Comment.  
**Date:** Friday, April 15, 2022 6:02:28 PM

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My name is Elix De Jesus Lopez and I am an avid surfcaster from the state of New Jersey. Inshore fisherman in NJ striped bass is one of the main targeted fish. They're just way too many poachers, not too many game wardens. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Elix De Jesus Lopez  
Elizabeth, New Jersey

**From:** [mbo1971@gmail.com](mailto:mbo1971@gmail.com)  
**To:** [Comments](#)  
**Subject:** [External] Recreational Comments Pertaining to Draft Amendment 7  
**Date:** Friday, April 15, 2022 5:55:54 PM

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Dear Commission Members,

Below, I have outlined my comments on proposed Striped Bass Amendment 7.

My name is Matt Orendorff and I reside in the state of New Jersey and am also a homeowner in Cape Charles on the lower eastern shore of Virginia. I am an avid fisherman who likes to target fish from both the surf and my kayak. I travel from North Carolina to Massachusetts in search of striped bass. I grew up in Maryland and starting fishing on the Chesapeake in the 1980's back when we could not target or harvest striped bass – something that was wonderful to move away from however I am fearful that without action we are headed towards once again. I have an 11 year old son who also likes to fish with me and I hope that one day he will get to see what quality inshore striped bass fishing looks like.

Before I comment on the individual pieces of the proposed Amendment 7, I would like to make a few general comments and recommendations.

-

My comments to the individual questions/tiers related to Amendment 7 in a list at the end of this document. I have highlighted a few notes of importance prior to outlining my specific preferences.

- The public information document for Amendment 7 was quite complex and I believe it dissuaded public engagement. In the future, at minimum, there should be a summary document that is short enough for the average angler to read in less than 15-minutes and can be understood by everyone. This engages public participation instead of discouraging folks from getting involved.
- The ASMFC has stated that the public is losing faith in their ability to make swift, critical decisions based on science and public input. Please, act fast and in accordance with science and the majority's wishes: do not delay or we will lose this fishery forever. We are already behind in the current 10-year rebuilding process.
- This is a critical juncture for the striped bass. Please, consider managing the striped bass for abundance and not for yield when making your decisions. Note that the striped bass fishery is almost entirely a recreational, catch and release, fishery, and that is where the largest portion of the GDP generated by the fishery comes from. The

good news is, the more fish in the ocean, the better it is for everyone: the fish, the overall economy, and recreational anglers.

- In the past, the ASMFC has adopted measures with low statistical chances of being successful, over very long timelines. I believe this is the wrong way to manage this fishery. We need better management and more aggressive measures that have a higher likelihood of protecting the fishery, and rebuilding and responding more quickly. I am in support of management that favors keeping “too many” fish in the ocean and responding to low spawning years and increased effort on a year-by-year basis.
- I am in complete opposition to any measure that would decrease the benchmarks the fishery is managed by. That is, we should not be lowering or shifting baselines. We have managed the population well in the past and should never consider decreasing our population targets (SSB thresholds and triggers). A sliding baseline is unacceptable and will be the demise of this fishery and will discourage angler participation.
- Above all else, I ask that the ASMFC act quickly, decisively, and with abundance- not yield- at the forefront of their striped bass management decisions. We must rebuild this fishery in less than 10-years, and at all costs, and that requires immediate and aggressive action from the commission. We are already behind in our rebuilding schedule.
- As a recreational angler in New Jersey, I have witnessed the abuse of the bonus program. When less than half tags that are allocated are returned, it means one of two things. Folks aren’t tagging all of the fish that they are harvesting or there are not enough fish to fill the quota! This program has practically become a “get of jail free” card for folks harvesting undersized fish. I have personally witnessed undersized fish being harvested at marinas and on shorelines across the state without affixing a tag. This program should be suspended indefinitely. When SSB thresholds reach target levels, it may be reconsidered if it is used properly for science-based research.

Below, I have outlined my preferences for Amendment 7.

On 4.1 Management Triggers, I support:

- Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality
- Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold
- Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions

- Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, I support:

- Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method
- Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, I support:

- Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. We recognize this option may require more restrictive management measures than option A, which we support

On 4.4.2 Rebuilding Plan Framework, I support:

- Option B to allow the Board to take direct management actions as well as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, "Management program equivalency (also known as "conservation equivalency" or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management."

I believe in restricting the use of conservation equivalency (CE) based on stock status.

Specifically, I support:

- Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level
- Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates
- Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries
- Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

Thank you for providing the opportunity to comment on Amendment 7. I look forward to learning the outcome of the upcoming stock assessment and to reading the final version of the Amendment.

Matthew B Orendorff  
Moorestown, NJ & Cape Charles, VA



**From:** [Caitlin Jones](#)  
**To:** [Comments](#)  
**Subject:** [External] Ammendment 7  
**Date:** Friday, April 15, 2022 5:48:32 PM

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To Whom it may Concern,

Thank you for the oppurtunity to comment on Ammendment 7 for Striped Bass, and one section I can particularly

I am loving wife and working mother to 2 young boys, and 2 wonderful dogs. Our best times spent together are on the water, fishing for Striped Bass. We spend most of our free time, late spring to fall, on our boat searching, casting, catching, and releasing these amazing fish. We never grow tired of it, even with the noticeable decrease of Striper population. It is a time for us to regroup as a family, releive daily stresses, breath in fresh air and enjoy eachother's company. Life is good when we are fishing, and life is better even when we aren't, as long as there is a set time in the near future that we can get out again.

There are also times when we explore places to fish from shore. These are the times when we encounter lots of other people aiming for the amazing Striped Bass; and with that we see their fishing ettiquette.

There is one day in particular, I will never forget...

For the past few years, we have driven a bit north to Plum Island at the very beginning of June, to a spot we discovered to be very "fishy". However, this past year we left feeling very sad, not the usual feels you get leaving a day of fishing.

It was a beautiful day. My husband and I were wet wading and the boys were playing on the beach. As we casted, we couldnt help but notice the fisherman down the way and his continuous rod bend. He was slamming them on bait. Would reel them in and aggresively rip the hooks out. If the Stripers were not of legal size limit, he would simply chuck the fish back into the water, as that is the law. Moments later the Stripers (size 18-27 inches) would float past us, belly up and dead. Awful. That same day, we watched a young man catch a nice Striper schoolie, about 22 inches long. He dragged it onto the beach, and it flopped on the sand for a good amount of time while he struggled getting the hook out. When he finally succeeded, he ran up to his spot on the beach where his family was watching from. He proceeded to have pictures taken of himself and the fish for the next 3 or 4 minutes. Eventually, he carried the lifeless fish back to the water and gave it a big toss in the air back to sea, not that it mattered at that point. The striper was dead before he even brought it back to the water. For the young man, it didn't matter. His hands were washed clean. The fish was not in the legal slot limit to keep, so he threw it back. He's not in trouble, as long as the dead undersized fish is not found in his cooler by authorities.

That day we will never forget is an example of why we must educate the public on the handling of Striped Bass. I support sub-option D2. There are an abudance of people fishing for Striped Bass that either don't know they are killing the species, or don't know why it would matter.

Thank you for your time,

Caitlin Jones

*A woman who loves fly fishing with her family* ☺

Sent from my iPhone

**From:** [Robert Incorvaia](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 5:42:07 PM

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Hello,

My name is Rob Incorvaia and I grew up chasing striped bass. I am writing to you today because I'm afraid at the rate we are going my future children may not, and my future grandchildren will most definitely not, have the chance to chase these same fish.

I have fished the Long Island sound for as long as I can remember and I'm proud to call it my home water. However, the way this fishery is managed brings me great disappointment. With this new piece of legislature, we have the opportunity to step in the right direction. It's not a fix all or a solution, but a commitment from you and me to work together for the longevity of the species.

There are several points of contention that I believe are detrimental to the health of the striped bass fishery. The first would be management program equivalency. CEs should not be allowed to be in use during times of overfishing in the striped bass population as stated in Section 4.6.2 sub options B1a and B1c.

In regards to section 4.4.2 option B, I believe we need a faster response to the 2022 stock assessment. We would need a reduction in removals of at the very least 5% immediately, not delaying it several seasons in order to achieve proper F rebuild.

Lastly, with release mortality levels so elevated, these account for the largest percentage of removals. In section 4.2.2 option B, suggested spawning area closures in specifically targeted areas are mentioned. I believe that while this could economically impact the springtime fishing industry, it would benefit it in the long run.

I appreciate your time and I hope we are able to come to a common understanding that can help save the east coast's game fish. Thank you.

Sincerely,  
Rob Incorvaia Jr.



**From:** [Joe Gross](#)  
**To:** [Comments](#); [Michael Armstrong](#); [Dan Mckiernan](#); [Rep. Sarah K. Peake](#); [Raymond Kane](#); [rick\\_jacobson@fws.gov](mailto:rick_jacobson@fws.gov); [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 5:36:11 PM

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Dear Members of the Atlantic States Marine Fisheries Commission, and the Massachusetts Atlantic Striped Bass Management Board:

As a member of the public, I am writing to submit my comments to the Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass. The amount of thought and effort that has been put into this document is remarkable, and I thank you all for the work that you do.

As a kid growing up in central Massachusetts, surfcasting was something I always wanted to try, but I lived too far from the ocean. Moving to Newburyport in 2005 finally allowed me to give it a try and I have now been saltwater fishing from the shore for the past 15 years. Targeting striped bass has put me in touch with a community of fishermen, and has given me a reason to spend outdoors with all of the benefits that has provided. Surfcasting for striped bass has also been a way to bond with my kids spending time on the beach, bringing in fish and teaching them what I know. I have tried fishing for other species but the reliability of bass fishing and the camaraderie with other bass fishermen is unique.

Therefore, I fully support the efforts being made to recover and preserve this species. It would be shortsighted to not implement controls now for the sake of the future of this fishery.

In addition to the specific notes below, I also call attention to the need for angler outreach about education regarding the need to protect striped bass, especially with regard to proper handling and release of caught fish to minimize catch-and-release mortality. Hand in hand with education is the need for enforcement of regulations to ensure that they are followed by all anglers, not only those that recognize their importance and necessity.

#### 4.1 Management triggers:

##### **Tier 1 Options:** Fishing Mortality (F) Management triggers

##### **Sub-option A1**

##### **Sub-option B1**

##### **Sub-option C1**

##### **Tier 2 Options:** Female Spawning Stock Biomass (SSB) Management triggers

##### **Sub-options A2**

##### **Sub-option B1**

##### **Sub-option C1**

**Tier 3 Options:** Recruitment Triggers

**Sub-option A3**

**Sub-option B2**

**Tier 4 Options:** Deferred Management Actions

**Option A**

4.2.2 Measures to Address Recreational Release Mortality

**Option A**

**Sub-option B1-a**

**B2-a**

**Sub-option C1**

**Sub-option C2**

**Sub-option D1**

4.3.2.1 Commercial Quota Transfers

**Continue current practice of no transfer**

4.4.1 Recruitment Assumption for Rebuilding Calculation

**Option B**

4.4.2 Rebuilding Plan Framework

**Option B**

4.6.2 Management Program Equivalency

**Sub-option B1-a**

**Sub-option B1-c**

**Sub-option B2-a**

**Sub-option B2-b**

**Sub-option C3**

**Sub-option D3**

**Sub-option E2**

Thank you,

Joe Gross  
3 Payson St.  
Newburyport, MA 01950

**From:** [nicholas favata](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 5:32:30 PM

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Hi,

My name is Nick Favata, I live in New Jersey and I am an avid surf fisherman. My family has fished for striped bass in our home state for four generations, starting with my great grandfather. Our family has cherished and enjoyed every minute chasing this incredible fish for many years. It is time now, to ensure that I can share the same with the future generations of my family, that striped bass will be protected and treated with the respect they deserve. This fish has built and sustained the economy along the entire east coast with fisherman flocking to our shore towns and tackle shops in the hopes that they too can experience all that striped bass have to offer. Unfortunately, these fish are declining and their prevalence will soon diminish to the point where the striper will be a folklore of the way things used to be. At this time, we have the opportunity to change their fate and ensure that a flourishing striped bass population will exist forever. Please protect these fish, they are the livelihood and sport of our east coast, we need these fish just as much as they need our help now. Below are my choices for amendment 7 as proposed by ASMFC.

Best regards,

Nicholas Favata

[nfavata@live.com](mailto:nfavata@live.com)

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4.1

TIER 1:

Support A1

Support B1

Support C1

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TIER 2:

Support A2

Support B1

Support C1

---

TIER 3:

Support A2

Support B2

---

TIER 4:

Support A

---

4.2

None

Support C1, C2

Support D2

---

4.4.1

Support B

---

4.4.2  
Support B

---

4.6.2  
Support B1-a  
Support C3  
Support D2  
Support E2

Sent from my iPhone

**From:** [Peter Corbin](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 5:30:47 PM

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I write to you as a fisherman, grandfather and father of striped bass fisherman. I have seen the stocks rise and fall and I am deeply concerned about their future. Please consider carefully and manage these special fish for abundance, ensure there is a sound rebuilding plan and get rid of conservation equivalency. Further educate people on how to properly release striped bass. I have pursued these fish for 70 of my 76 years and painted scenes of them for 40years.

Please consider and act on the following:

#### 4.1 Management Triggers

Tier 1: Fishing Mortality (F) triggers

Option A: Timeline to Reduce F to the Target - Sub-Option A1 - status quo

Option B: F Threshold Triggers - Sub-option B1 - status quo

Option C: F Target Triggers - Sub-option C1 - status quo

Tier 2: SSB Triggers

Option A: Deadline to Implement a Rebuilding Plan - Sub-option A2

Option B: SSB Threshold Trigger - Sub-option B1 - status quo

Tier 3: Recruitment Triggers

Option A: Recruitment Trigger Definition - Sub-option A2

Option B: Management Response to Recruitment Trigger - Sub-option B2

Tier 4: Deferred Management Action - Option A - status-quo

4.2.2 Measures to Address Recreational Release Mortality - B2-b - no harvest in spawning areas + Sub-option C1 & C2

Option D. Outreach and Education -

Sub-option D2

4.4 Rebuilding Plan - Critical that we have a rebuilding plan

4.4.1 Recruitment Assumption for Rebuilding Calculation - Option B

4.4.2 Rebuilding Plan Framework - Option B

4.6.2 Management Program Equivalency - Do not use Conservation Equivalency as a management tool, this a coastal species not a state species

Thank you for considering these views,

Peter Corbin

--

Peter Corbin  
[peter@petercorbin.com](mailto:peter@petercorbin.com)

PETER S. CORBIN, INC.  
81 Fraleigh Hill Road  
Millbrook, NY 12545  
w 845-677-5020  
c 914-489-1615  
[www.petercorbin.com](http://www.petercorbin.com)

**From:** [Wes Preston](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amemdment 7  
**Date:** Friday, April 15, 2022 5:29:58 PM

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Dear ASMFC,

My name is Wes Preston and I am from Connecticut. Striped bass are important to me because I grew up fishing for them and it is important that my children have the opportunity to fish for them. Without an abundance of striped bass I will be forced to exit everything that encompasses the recreational saltwater fishing economy. I cherish my time on the water and want my money to go to my marina, tackle shop, the deli I stop at 6am, and the countless other ancillary businesses that benefit.

Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,



---

Wes Preston

Wilton, CT

[Lwpreston88@gmail.com](mailto:Lwpreston88@gmail.com)

**From:** [Dustin Walker](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 5:28:20 PM

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Keep the regulations the way they are.  
Keep Circle Hooks for Live bait.  
Keep the current "keep" slot.

This is a great management program.

**From:** [Ernest Valerio](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 5:22:15 PM

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I would like to see the striper be classified as a recreational fish for at least 8 years

Sent from my iPhone

**From:** [Brian Garnock](#)  
**To:** [Comments](#)  
**Subject:** [External] Comment for amendment 7  
**Date:** Friday, April 15, 2022 5:17:41 PM

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My name is Brian Garnock and I am an avid surfcaster from the state of New York. Striped Bass fishing means so many things to me. From relaxation to the hunt, to understanding water chasing after these creatures that should be considered a game fish just like our Tarpon. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

**From:** [Bob](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 5:14:25 PM

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My name is Robert Ekey and I am an avid boat fisherman from the state of New Hampshire. The striped bass season in New England is treasured by sports fisherman. Whoever said a live fish is worth more than a dead fish may have been speaking if striped bass in New England based on her fanatical fisherman and all the money they spend to engage in catch and release Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Robert Ekey  
Exeter, New Hampshire  
Email: [bobeekey@gmail.com](mailto:bobeekey@gmail.com)

**From:** [Doug Wells](#)  
**To:** [Comments](#)  
**Cc:** [WILLIAM HYATT](#); [ROBERT LAFRANCE](#); [Rep. Melissa Ziobron](#); [Justin Davis](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 5:06:21 PM

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To whom it may concern:

I would like to briefly make some comments in support of the Amendment 7 draft for the ASMFC. My position comes first as a lifelong fisherman, and secondly as a small business owner who is dependent on a healthy and sustainable striped bass fishery.

I am a 3rd generation saltwater fisherman in the Housatonic River area of Connecticut. I grew up in the 1980's when the striped bass stock was in severe jeopardy. What we see today mirrors the situation as I understood it as a kid. There is now a continuous stress on the striped bass population year-round, especially in the lower Housatonic River and similar estuaries. I believe firmer controls need to be taken not just on the CT fishery, but up and down the coast. I believe some of the foundations of Amendment 7 are a step in the right direction, but I would suggest more be done.

I am in favor of closed seasons in CT and other Atlantic states that are noted spawning areas for striped bass. It's increasingly critical that they be protected, especially during this period. Without closing the season, you would see a continued stress on the population, along with an out of control poaching situation which many of us see in the Connecticut region. Enforcement is not at the level that it should be to handle the poaching, and therefore shutting it down for a period may be best served for all.

As a business owner of a 30+ year old saltwater fishing business, The Surfcaster, the company has faced many economic challenges, especially over the last 2+ years with Covid's effects. Adding to it a reduced striped bass fishery (and bluefish fishery as well) has put further strain on my retail business. As a result of this, I made the decision in 2019 to close my storefront, and offer my products online only. Covid made this decision even more important, but it was absolutely driven by a softening striper fishery and slower retail sales as a result. I try to run a sustainable business, and I believe the ASMFC should manage a sustainable fishery. I believe Amendment 7 has some positive attributes and is a good step, but not a big enough one, in the right direction.

Please continue to pursue and enact legislation which protects the striped bass fishery for the entire East coast. It needs to be comprehensive, consistent, thorough, and most importantly, enforced! Enforcement needs to be a pillar of this plan to ensure its success.

Humbly submitted,  
Douglas Wells

Father, Fisherman, Outdoorsman, and Small Business Owner  
[doug@thesurfcaster.com](mailto:doug@thesurfcaster.com)  
Mobile: 203-610-6965

The Surfcaster  
63 Normandy Rd  
Trumbull, CT 06611

[www.thesurfcaster.com](http://www.thesurfcaster.com)



**From:** [Tom Brightman](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 5:00:20 PM

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Dear ASFMC:

My name is Tom Brightman. I am from Dover, New Hampshire.

Striped bass are important to me for several reasons: because I enjoy recreational fly-fishing for them; because they are part of a healthy ocean and estuarine ecosystem, and because they support the regional economy for the Seacoast New Hampshire region, and areas like it all along the Eastern Seaboard. It is vital that this species recovers from decades of over-fishing, and from the loss of its main forage base, menhaden.

Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1  
Support B1  
Support C1

TIER 2:

Support A2  
Support B1  
Support C1

TIER 3:

Support A2  
Support B2

TIER 4:

Support A

4.2

None  
Support C1, C2  
Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a  
Support C3  
Support D2  
Support E2

Thank you for the opportunity to comment!

Sincerely,

Tom Brightman

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1 Clearwater Drive

Dover, New Hampshire, 03820

[tbrightman@me.com](mailto:tbrightman@me.com)

**From:** [Steve Kwietniak](#)  
**To:** [Comments](#)  
**Subject:** [External] Comment for Draft Amendment 7 I  
**Date:** Friday, April 15, 2022 4:57:45 PM

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My name is Steve Kwietniak and I am an avid surfcaster from the state of Massachusetts. I live on Cape Cod and regularly fish for Striped Bass and other species. I am saddened by the spawning reports and believe action should be taken to improve the numbers of these amazing fish. As a long time fisherman I would support moving to a Catch and Release only regulation until the stock numbers increase to a mass capable of sustaining harvest once again. Even a limited Catch and Release regulation during spawning season or in certain vulnerable locations such as the Cape Cod Canal would be helpful. We do it with Trout in certain streams - why not with Stripers in certain waterways? Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Steve Kwietniak

Barnstable, Massachusetts

Email: [sakwietniak@gmail.com](mailto:sakwietniak@gmail.com)

**From:** [Michael Lindsay](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] ASMFC Public Comment Striped Bass  
**Date:** Friday, April 15, 2022 4:50:02 PM

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Dear ASMFC,

My name is Michael Lindsay and I am from the state of New York. Fishing has been a constant in my life since I've been 7 years old catching catfish in Clove Lakes park. Today, I consider myself a serious surfcaster along with my group of 8 friends, all of whom I've been fishing with since those days in Clove Lakes. We care deeply about not only the Striped Bass fishery, but all game fish in our area. Over the last few years we've witnessed a serious decline in the amount of fish swimming in our waters. I believe the projects to clean up the waters in Raritan Bay and the Hudson/East Rivers have done an excellent job but there still remains tremendous pressure on the ability for the local fisheries to survive. The reason I am writing this is because I have a very young daughter, only 6 months old. She's my first child and I would love nothing more than to share my passion for Striped Bass fishing with her one day. At this rate, based on the amount of poaching I witness at local popular surf spots, the charter boats killing 1 fish per person almost every trip daily, and the devastating commercial practices, I do not believe I'll be able to do that in 10 years. I desperately hope that someone involved in striped bass management will chose to do the right thing and support all conservation efforts regarding the beautiful Striped Bass.

Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

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Thank you for the opportunity to comment, and I hope that my voice will be heard.

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Sincerely,

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Michael Lindsay

New York, NY

**From:** [Andrew G](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 4:48:30 PM

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Hello,

My name is Andrew Garnitz and I am a life long waterman from Marblehead Massachusetts. I was introduced to striped bass fishing as a young boy on our rocky coastline. Through the years that transitioned to kayak, boat and stand up paddle board fishing. I learned from my grandmother, and am now a father of two young children who I am sharing my passion with.

I am aligned with the American Saltwater Guide Association in the striped bass management and will be closely following the decisions of your organization.

I believe that if we really want to continue to enjoy this amazing fishery, we need to act now, correctly, and uniformly.

The striped bass provides such an amazing economic benefit to our coastal towns. Fishing Guides, Tackle Shops, Marine Mechanics, Boat Dealers, and news publications all get tremendous business from this fish.

To improperly manage this fish would damage many people financially.

There needs to be a balance between states, organization and recreation/commercial.

As a step towards this, I urge you to stop with the Conservation Equivalency.

We also need regulations that are quantifiable and enforceable, which seasonal closures is not!

This fishery has been improperly managed for the last decade and we need to work collaboratively to fix this the right way so our future generations can enjoy this amazing species like we all do.

Its all about the next generation.

Thank you for your time and consideration,  
Andrew Garnitz  
F/V True North

**From:** [Fowler Storms](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 4:38:05 PM

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To whom it may concern,

I have been following the stripes bass discussions with ASMFC.

I would like to submit a comment on one topic I feel strongly about: Conservation Equivalency needs to end when stock is below its threshold status. Every state should abide by the same rules, since these fish travel between states throughout the fishing season. It makes little sense to have different regulations between them.

Thank you.

Fowler Storms  
646-866-9424



**From:** [Adrian Ayala](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 4:37:49 PM

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Hello, my name is Adrian, I am a fisherman who was a sneaky and now sporty fisherman and now I pass this experience on to my son. I would like stricter laws to conserve fishing of any species, especially striped bass, since there are many people who damage the species too much. I know that everything has expenses an example to obtain money fishing licenses should be sold and laws must be made that people who abuse them at 3 lose it for the entire season

**From:** [Jeffrey Doyle](#)  
**To:** [Comments](#)  
**Cc:** [Raymond Kane](#); [Sarah.Peake@mahouse.gov](mailto:Sarah.Peake@mahouse.gov); [Dan Mckiernan](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 4:37:45 PM

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I am a resident of Cape Cod, Dennis specifically and am a recreational fisherman. All my life I have enjoyed fishing, fresh or salt, small or large; the pleasure is just being outside, on the water and sometimes catching fish.

I moved to the Cape full time about 6 years ago. As a full time resident, I have the great pleasure and honor to avail myself of fishing the waters of the Cape - the bay, the sound, and the ocean - and enjoying the bounty around us. I do eat what I catch and only harvest fish that I will eat with certainty over the coming days.

Certainly, Stripers reign supreme here, the target of many fisherman. Especially in the summer, the amount of boats targeting stripers is immense. The pressure is huge, for everyone wants to catch a striper on their trip out. Yet, everyone seems to want to take a Striper home, a badge of honor. I have seen many fisherman, guests taking stripers home just because.

Over the past few years, the amount of stripers I have caught and, although not scientific in nature, my network would also say the same. I do think its time to put restrictions on Stripers, specifically only a catch and release, full circle hook in every state. Frankly, let's go catch and release for a few years. I do think we need to get that drastic, while shifting some of the attention to other species as desirable catches. I am hoping Fluke limits go up for sure, but let's encourage all to look at other species to go after. Personal choice i know, but striped bass are not the best tasting fish around - Haddock, the elusive cod (another story), fluke, flounder, black sea bass, even scup are much better for the table.

While it would be significant change, I would advocate for even tighter restrictions, even limiting the season during the migration so the breeders can get to where they need to be. While it is an impact, the commercial fishery for Stripers is small given the existing limitations on them. Shutting down the commercial side is a small impact when 97% of the economic value is in the recreational side. Also, consider sister fish limitations too. For example, shut down bluefish and striper season at the same time so that you don't mistakenly go after Stripers when fishing for Blues - same area, bait, lures, etc. Another consideration - increase the tagging program, requiring charter captains to tag as part of their licensing, target random, more frequent recreation fisherman for inclusion in the tagging program. This later activity can be managed through key retailers in a given region (Goose Hummock in Orleans) for distribution of tags.

I support the idea of non lethal, but go one step further. Say netting only, remove lippers, boca grips, or grabbing through the gills. Be very specific to limit the mortality rate (9% of recreational release). Education is always a good thing, but frankly a waste of time. The serious anglers already get it, practice the matters...its the guests on boats, the once a summer guest...and the charter captains looking to get fish on board fast.

I understand there are other factors, including their feeding stock (bad year for bait in my area - mackerel and bunker), water temp, and cleanliness of the water, but I do believe we are at a moment in time where the Striper stock is accelerating in the wrong direction. Let's be aggressive now to restore the stock up and down the east coast. It is my humble opinion that the serious recreational fisherman would be fine with a full catch and release program and even some limits on the season. Some less frequent fisherman and charter captains will grumble, but other fisheries can be targeted during those times. One last point - keep it simple, black and white. None of this mathematical adjustment factors, etc...just make a decision to limit severely and be done.

in conclusion, please be aggressive. We don't need to create another Cod situation in this area.

**From:** [Jim Deveney](#)  
**To:** [Comments](#)  
**Subject:** [External] Response to request for comments concerning striped bass Amendment 7  
**Date:** Friday, April 15, 2022 4:34:11 PM

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Dear ASMFC,

My name is James Deveney and I am from the state of Massachusetts. Striped bass are important to me because of their recreational value. I have been fortunate to fish for them for over 60 years. I endured, and persevered through their population decline during the 1980s. I fully supported their rebuilding and the sacrifices to do so. I do not wish to see such a decline happen for future generations of anglers. We are all caretakers and stewards of the future.

Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Respectfully,

James Deveney

Dighton, MA 02764

**From:** [Peter Auster](#)  
**To:** [Comments](#)  
**Cc:** [WILLIAM HYATT](#); [Sen. Craig A. Miner](#); [Justin Davis](#); [LaFrance, Robert](#); [Rep. Melissa Ziobron](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 4:33:51 PM

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To Whom It May Concern:

Thank you for the opportunity to comment on alternatives for Striped Bass Amendment 7. This amendment, as you likely recognize, is complex and tying all the alternatives to positive conservation outcomes, both independently and together, produce the greatest probability of a positive outcome for both striped bass populations, for enhancing and sustaining ecosystem status, and for benefits to fishers who have an abiding interest in this natural resource. Below please find my preferred alternatives and rationales:

1. Tier 1 - Fishing Mortality (F) Triggers.

For option A, time to reduce F to target, I recommend sub-option A1. That is, status quo to reduce F that is at or below target F within one year. Corrections for exceeding F in any one year does not necessarily respond to subsequent responses in a predictable manner. That is, responses to management interventions are often non-linear and it is possible to exceed ecological tipping points driven by physical or biological interactions.

For option B, F threshold triggers, I recommend sub-option B1. That is, status quo, such that if F exceeds F threshold, management intervention must reduce F to a level at or below the threshold in the period determined in option A. The rationale here is the same as stated above, to as rapidly as possible reduce F to avoid nonlinearities in response to high F.

For option C, F target triggers, I recommend sub-option C1. That is, status quo, such that if F exceeds target F for two consecutive years and female SSB declines below SSB target in either year, management intervention must reduce F at or below target F within the period determined in option A. The rationale here includes the logic as stated above and is inclusive of the relationship between SSB and probability of recovery.

2. Tier 2 – SSB Triggers

For option A, deadline to implement a rebuilding plan, I recommend sub-option A2. That is, the two-year deadline to implement a plan after the SSB trigger is reached. This period is in line with Federal Magnuson requirements.

For option B, SSB threshold trigger, I recommend sub-option B1. That is, status quo, such that if female SSB declines below the SSB threshold, management intervention must set rebuilding of biomass to the target level as rapidly as possible and within a period not to exceed 10 years. Rapid recovery of SSB will minimize the potential for responses of predators and competitors to respond to changes in species level changes in ecological function.

For option C, SSB target trigger, I recommend sub-option C1. That is, status quo, such that if female SSB declines below target for two consecutive years with concomitant F exceeding target in either year, management intervention must implement rebuilding as rapidly as possible to achieve target levels and within a period not to exceed 10 years. Management of fishing mortality is the principal tool to recover and sustain exploited populations and must be implemented quickly to avoid unforeseen responses to populations that require more

draconian measures.

### 3. Tier 3 – Recruitment Triggers

For option A, recruitment trigger definition, I recommend sub-option A2. That is, the recruitment trigger is reached when any of the Juvenile Abundance Indices in the stock assessment model declines to a value below 75% - the 25<sup>th</sup> percentile – based a reference JAI from 1992-2006 for three consecutive years. The current trigger is not sensitive to variations in recruitment and should be adjusted to serve the intended function.

For option B, management response to recruitment trigger, I recommend sub-option B2. That is, if the recruitment trigger is reached, an interim target F using the low recruitment assumption is calculated. Management intervention is required to reduce F to the interim target F within one year. Here a rapid response to decline in recruitment can minimize the longer term population responses to poor year classes.

### 4. Tier 4 – Deferred Management Action

I recommend option A, no deferred management action. That is, if any management triggers are reached, management is required to respond.

### 5. Measures to Address Recreational Release Mortality

Catch-and-release mortality is a significant component of fishing mortality. Here I support options that require nonlethal devices to remove fish from the water or for in-water release. Further, I support options that require immediate release of fish caught by unapproved methods.

### 6. Option D - Outreach and Education

I recommend sub-option D2 to continue state-based public education of best handling and release practices.

### 7. Recruitment Assumption for Rebuilding Calculation

I recommend option B, rebuilding SSB to the SSB target level no later than 2029, using the low recruitment assumption. This option with the low recruitment regime better accounts for the current status.

### 8. Management Program Equivalency

Conservation Equivalency (CE) essentially allows state by state variations in management regulations with too many examples of states not meeting conservation targets, and the rest of member states (and fish populations and anglers) suffering because of it. CE should be discarded or significantly redesigned such that CE programs are not considered when a stock is classified as overfished. Simply put, CE adds more risk to management actions when unevenly applied across states and confuses assessment of adaptive management measures. Thank you, in advance, for your consideration. I would be happy to discuss any of these recommendations or comments further.

Sincerely,

Peter J. Auster

Peter J. Auster, PhD  
Senior Research Scientist, Mystic Aquarium - Sea Research Foundation  
Research Professor Emeritus, Dept. of Marine Sciences - UConn  
Cell - 860-304-8842  
Tel - UConn 860.405.9318  
[www.searesearch.org](http://www.searesearch.org)  
Lab page:  
<http://austerfishlab.weebly.com/>  
UConn Faculty Page:  
<https://marinesciences.uconn.edu/person/peter-auster/>

**From:** [Peter Schooling](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7 Comments  
**Date:** Friday, April 15, 2022 4:33:26 PM

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Members of the ASMFC,

I am an avid recreational fisherman who targets striped bass throughout New England and the Mid Atlantic region. This is a fish that I cherish deeply and through my pursuit of this fish, I contribute to local economies and small businesses from tackle shops and hotels to restaurants and guides. I caught my first striped bass, at a young age with the help of my father. I would love to be able to pass this same experience on to my children one day.

I would like to particularly comment and voice my support for a few of the options in this amendment, particularly those related to timing of manamangemt responses, Conservation Equivalency and rebuilding plans moving forward.

I would like to voice my support for the following options within this amendment:

4.1

Tier 1

- Option A1 - I support a one year target as the fastest way to reduce mortality in the stock

Tier 2

- Sub-option A2 - I support a 2 year year deadline to implement a rebuilding plan so management practices can be quickly put in place to aid rebuilding an ailing fishery. Homogenizing this process with federal fisheries management policies will be better off for the striped bass.

Tier 3

- Sub-option A2 - With some very poor recruitment classes documented in the past 20 years, it is inconceivable that the management triggers have not been set off. I support modifying the recruitment trigger definition to the values outlined in this option.

4.2.2

- Suboption C1 and C2 - I wholeheartedly agree that striped bass, especially those who are intended to be released, should be removed from the water with care and therefore, I support mandating the use of non lethal means of removal from the water. I also agree that any striper caught on unapproved tackle/method should be immediately released

4.4



4.4.1 Option B - Building back female biomass in the striper stocks is very important. Setting a management time frame to work towards sets goals and can influence management decisions moving forward.

- 4.6.2 - Option B - I strongly believe that it is important to allow flexibility in fisheries management regulations to allow the best management practices to be implemented at a member level. However, when assessment data shows that these practices lead to biomass below the management thresholds, it is a pretty strong indicator that the current practices are not working. I believe it is imperative to manage the striped bass population as an entire biomass and not allow CE until fish stocks are assessed to be above the management thresholds.

I sincerely appreciate that the public is able to be involved in this process, provide comments and participate in the decision making that will impact a fish species near and dear to many of our hearts.

All the best,

Peter Schooling

Maynard, MA

[Peter.Schooling@gmail.com](mailto:Peter.Schooling@gmail.com)

**From:** [CYNTHIA HART](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Comment  
**Date:** Friday, April 15, 2022 4:32:45 PM

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April 15, 2022

Emilie Franke

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

Dear Ms. Franke,

As an avid angler and outdoor sportsman, I believe the time is now to act strongly and protect the future of striped bass.

I strongly support the specific recommendations by the Virginia Saltwater Sport fishing Association and the Coastal Conservation Association.

I truly thank you for all you do and this opportunity to share our comments.

Very Respectfully,  
R. Frank Hart, III

Sent from my iPhone

**From:** [Phil Coates](#)  
**To:** [Robert Beal](#); [Comments](#)  
**Subject:** [External] Thoughts and comments concerning Striped Bass Amendment 7  
**Date:** Friday, April 15, 2022 4:28:23 PM

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Hi Bob and ASMFC staff,

I think the last time I saw you was at Doug Grout's retirement party. That was a good time as was the ASMFC's 75th

Anniversary and Annual Meeting in Bar Harbor. I recall briefly attending the Striped Bass Board meeting there and was astounded to hear the Maryland Watermen's plea to lower the Bay size limit which flashed me back to the early 80's and the beginning of striped bass restoration. At one of the early well attended meetings in the DC area, back when the bass size limits were 12" in the Bay and 16" on the coast, the notion of raising either size limit was strongly resisted. After watching the decimation of the large '70 year class, some of us realized that the backbone of the emerging restoration plan had to be protection of spawning fish, hence the 18" Bay to protect the males and 28" on the coast for the migrating females. The initial plan also included, back then, very conservative F levels and biomass maintenance levels not tied to MSY, arguably making the 1984 Plan the most conservative yet enacted. We were applauded by the conservationists and dammed by the users, I recall. I've always considered the success of the Atlantic Striped Bass Management Plan one of ASMFC's greatest achievements.

Unfortunately, we are now facing, from my and others perspectives, threats to this magnificent resource greater than what confronted us back then. While fishery management has improved significantly over the last several decades with monitoring, data processing, and other tools able to provide necessary information to managers on a timely basis, our concern focuses on the lack of similar progress in alleviating environmental degradation. As a case in point, look back at '80's Maryland young of the year indexes and dropping stock sizes that, along with diminishing catches, initiated the restoration process. Both had been low for at least three years, even given the sketchy stock size/yoy production vagaries that characterize striped bass. The initial plan was formulated to create a favorable spawning climate and the bass responded with a strong 1990 year class which was nurtured until stock size rebuilt and fishing resumed in 1995.

Currently, we have had three years of poor recruitment but SSB, although dropping, is much higher than it was in the '80's so it's been reasonable to expect some spawning success unless there are other intervening factors at work. We are very concerned about degrading environmental conditions in the Bay impacting YOY survival. The continued documentation of anoxia and hypoxia in the Bay is of particular concern, particularly it's documented lethal impact on non mobile species such as shellfish and crabs and possibly on relatively non mobile juvenile - yoy striped bass. Low dissolved oxygen coupled with higher water temperatures is also creating more problems in coastal waters, Cape Cod Bay being a recent example. Current monitoring efforts in the Chesapeake and particularly Maryland Bay waters must be continued and expanded and studies initiated to further examine juvenile bass low/oxygen interaction. By comparison, Virginia's last three YOY indexes have varied above the long term average and the disparity between VA and MD is noted in the draft plan but not understood. The Hudson's last three years YOYs have also varied with the '20 index the 4th highest in their time series. We raise habitat concerns to underscore the absolute need for the Board to move forward with maximum conservatism in fleshing out Amendment 7. Another poor YOY index in the MD side of the Bay may well be catastrophic.

Moving from the uncontrollable to more specific Plan options, may we offer the following:

All applicable options should be selected assuming low recruitment.

All applicable options should be selected giving the Board maximum capability to enact actions as soon as possible.

The Board should have the capability to eliminate CE as needed.

Regarding recreational effort control, we recommend the 25 % reduction- 2 week closure should be

selected and include targeting, recognizing the challenge this presents to enforcement. Some bass bycatch will often occur when targeting other species and knowledge of bass and other seasonal species distribution patterns, fishing techniques and enhanced observation may help identify those targeting bass from others seeking other species. A no targeting recommendation in the plan can give the enforcement folks the option of verbal warnings which may deter some.

Regulating catch and release fishermen, particularly during bass fishing (and targeting) seasonal closures, should they occur, is a daunting challenge. Most have a mindset that with proper handling techniques, the mortality of their released fish is far lower than the current 9% rate. Most fly fishermen and light tackle aficionados are in this group and the former were not included in the original C/R study, I believe. There are other skeptics as well and some raise the validity of the 9% given that bass over 32-3" were not included in the original study. I realize that most catch and release studies conducted on striped bass in fresh water were deemed inapplicable. There is, however, one very long standing catch and release fishery, the professional bass tournaments, that might warrant examination since they evaluate C&R mortality on their catches of mostly mature bass. Obviously the best course to fill this void is new catch and release studies on larger bass, something I believe that is underway in my former agency. We personally feel, given our long standing experience participating in and observing targeted large bass fishing, that the 9% rate is too low.

Lastly, to the degree possible, we suggest that the severity of the final options adopted by the Board could be conditioned somewhat based on the degree to which Addendum 6 of Amendment 6 achieves it's 18% bass removal reduction goal. Although we support moving forward with Amendment 7 as soon as possible the argument made by some that the Board should evaluate results of currently implemented actions before piling on more has some validity. Unfortunately the difficulty for the Board to evaluate some of the intangible stock impacts such as aforementioned environmental degradation, makes overcorrection somewhat more acceptable.

We want to thank the Board and all others who assembled this Amendment, and I appreciate how daunting this task has been. Now, as they say, it's time for the rubber to meet the road.

All the best,  
Phil Coates  
Ex fishcrat

**From:** [George Brencher](#)  
**To:** [Comments](#)  
**Cc:** [Justin Davis](#); [william.a.hyatt@snet.net](mailto:william.a.hyatt@snet.net); [Sen. Craig A. Miner](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 4:28:10 PM

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I am sending you this email by way of comments to proposed Amendment 7 to the Interstate Fishery Management Plan for Striped Bass.

I am a resident of Connecticut and am a long time recreational fisherman for bass in the waters of Long Island Sound and Cape Cod. I have personally witnessed a decline in fishing opportunities for striped bass and believe the stock needs immediate and serious attention. I grew up surf casting on the Cape during the 70s and 80s and well recall how bad things can get. We should now know better and should not be moving backwards on conservation efforts.

As a general matter, I support the positions on Amendment 7 recommended by the American Salt Water Guides Association. I believe their approach is well considered and represents a thoughtful and reasonable approach on what is, obviously, a very complex regulatory proposal.

Specifically, I feel strongly on Section 4.1 that immediate action is necessary to protect the stock and support the following on Tier 1: Option A1, Option B1 and Option C1. On Tier 2, I support Option A2, B1 and C1. On Tier 3, I support Option A2 and B2. On Tier 4, I support Option A.

On Section 4.2.2, I believe the position of the ASWGA is a reasonable one and support Option C1 and Option C2. I also support Option D2 regarding best practices on catch and release.

This has, obviously, been a point of emphasis in fresh water trout fishing and a similar approach for striped bass seems only sensible given the state of the fish stock.

With respect to Sections 4.4.1 and 4.4.2 regarding rebuilding, I support Option B for both.

This is the more conservative option and feels totally warranted given the apparent state of the fishery.

Conservation Equivalency (CE) is an obvious problem, allowing individual states to effectively abuse a system designed to protect a shared resource. On Section 4.6.2, I support Option B 1-a. CE flexibility is not appropriate when stocks are vulnerable. On Option C, I support Option C-3, which is consistent with NOAA's approach to MRIP information and a more conservative approach. On Option D, I support D2 as it provides a helpful, reasonable incentive for states not to abuse CE. On Option E, I support E2. This seems like.

Straightforward correction to an unintended flaw in the existing approach.

Thank you for considering my comments.

Sincerely,

George Brencher

**From:** [Olivia Ostiguy](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] STRIPED BASS CONSERVATION  
**Date:** Friday, April 15, 2022 4:24:59 PM

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Dear Ms. Franke and Atlantic Striped Bass Management Board,

My name is Olivia Ostiguy and I've been a lifelong naturalist in Massachusetts. Although, I enjoy all species, terrestrial to aquatic, the last few years, I've come to appreciate the striped bass, more so than ever. To watch their numbers dwindle and to see the fast effect it has had on the ecosystem, has truly driven me to want to be part of the solution.

I hope we can speed up the conversation efforts coast wide so that future generations can learn and enjoy this species of bass before it becomes too late.

Thank you for your time. My options are as follows:

#### **4.1**

##### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

##### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

##### **Tier 3**

Option A- Support A2

Option B- Support B2

##### **Tier 4**

Support A

## **4.2**

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D2

### **4.4.1**

Support B

### **4.4.2**

Support B

### **4.6.2**

Option B- Support B1-a

Option C- Support C3

Option D- Support D2

Option E- Support E2

I appreciate the opportunity to provide comments. I do hope the Board seizes this opportunity to restore public trust and realize their mission of "leaving healthy and abundant marine fisheries for the next generation to enjoy"

Sent from my iPhone

**From:** [DOUGLAS TAYLOR](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 4:18:27 PM  
**Importance:** High

---

My name is Douglas A Taylor and I am resident of New Jersey. Striped bass are important to me because I am a Recreational fisherman and wish to allow those that follow will also be able to enjoy the chance to catch Stripe Bass

Concerning the Amendment 7 for the Stripe Bass control, Section 3.6, I am requesting that the wording concerning the Hatchery raised fingering should be changed to be included in the plan, so that at each state's discretion it may be used as a means of helping to bring back the stripe bass population. Stocking fingerlings would be obtained from harvested roa of wild stripe bass and reintroduced from known designated breeding grounds. This would allow for a greater chance of survival for the young. The reason for my support is that at present Virginia and Maryland have an active hatchery program for Striped Bass.

As for my stance on Amendment 7 I support:

#### **4.1**

##### **TIER 1:**

Support A2  
Support B1  
Support C1

##### **TIER 2:**

Support A2  
Support B1  
Support C1

##### **TIER 3:**

Support A2  
Support B1

##### **TIER 4:**

Support A

#### **4.4.1**

Support B

#### **4.4.2**

Support A

#### **4.6.2**



Support A

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely, Doug Taylor

**From:** [bdoheny](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 4:16:42 PM

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Thank you for the opportunity to comment on amendment 7 concerning striped bass. Please help the striped bass by cancelling the commercial harvest of striped bass and make the cape cod canal catch and release only until the striped bass recover. Thank you for listening.

Sent from my iPhone

**From:** [eric Harrison](#)  
**To:** [Comments](#); [Michael Armstrong](#); [Dan Mckiernan](#); [Rep. Sarah K. Peake](#); [RICK.JACOBSON@FWS.GOV](#)  
**Cc:** [stripercomments@gmail.com](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 4:13:18 PM

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I'm writing to support a conservative approach to striped bass management. As a recreational angler in MA I feel left out of the fisheries management process, not because you haven't listened but because fisheries managers in MA have consistently failed to rebuild and maintain stocks.

I would point to striped bass, cod, bluefish, and winter flounder as huge failures in cape cod bay. All stocks are diminished and none are managed for abundance or accessibility to recreational anglers. Unfortunately as an inshore angler around Boston, these are the primary species I have available to me.

Recreational anglers targeting striped bass generate significant economic activity and local jobs. It dwarfs our commercial striper fishery in economic impact ; our commercial fishery is an embarrassment to the state, targeting BOFFFFs when we know their value is unconscionable...and the definition of bad management.

I'm asking you to take an approach that rebuilds the stock quickly, manages for an abundant fishery, and preserves the recreational angler's access to the fishery.

Eric Harrison

Get [Outlook for Android](#)

**From:** [Carl Johanson](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 4:07:34 PM

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Dear ASMFC

I'm an organic vegetable farmer and Forester in Midcoast Maine. My time spent on the water fishing for striped bass keeps me sane. The mental health benefits associated with fishing and outdoor recreation are well documented. Without this time on the water I wouldn't be able to consistently pull the 72 hr+ weeks, manage a crew of 24, and keep the vegetable farm running.

As a farmer, I am a steward of the land. We take care of our soils, so they can feed our communities for generations. I plant cover crops, reduce my fertilizer use, to protect the ecosystems I love. I apply the same mentality to striped bass management. I have fished for stripers on the Kennebec River my entire life and have noticed a significant decrease in abundance of fish here in the Merrymeeting Bay. While I'm still catching fish in select areas, spots that held stripers for years are now empty. I want to sustain a fishery so when I have kids I can take them out fishing and give them the exciting and thrilling experience I had as a child during the golden years of striper fishing.

Below I have listed my preferences on Amendment 7.

Tier 1: A1, B1, sub-option c1: Global warming and climate change present an immense challenge for fisheries managers. Building resilient populations and being able to pivot management decisions from year to year is extremely important. BUT we must be better about enforcing and making the decisions.

Tier 2: Option A:

sub-opt A2. We need to have rules in place that force response to overfishing. The 2 year response timeline is plenty of time to crunch the data and make management decisions.

Option B: sub-option B1: We need to address stock changes quickly. While I understand it cannot change, the 10 year max time frame is less than ideal.

option C:

sub-opt C1: This is essential and the number one tool we have to ensure sustainability and resilience to climate change and other stressors such as fluctuations in fishing pressure.

Tier 3:

Opt A: Sup Opt a3: This rings close to home as native striped bass recruitment in my home waters of the Merrymeeting Bay continue to decrease despite fishing controls. The current trigger is outdated and should be updated to ensure recruitment.

Opt b: sub opt b2 We need to be responsive to what the science is telling us and not exploit good year classes and acknowledge poor ones.

Tier 4: opt A: We cannot keep deferring action. We must make management decisions if the science and measurements are showing us we must act.

4.2.2 I release all my fish. I keep them in the water, crush my barbsm, handle them with wet hands, and use circle hooks. And yet I know several of the 50 or so I caught this season died

based on damage of the hook to gills, and bleeding from the hook. I support b2-b targeting closures to protect specific populations of striped bass. For example if fishing for holdovers becomes as popular as it is in MA I would like a system in place to reduce that fishing pressure. In the future perhaps we should consider fly fishing only periods like they have in Northern Maine brook trout waters.

I support sub opt c1, 2

Public education is incredibly important! please include sub opt D2. I have learned so much from listening to podcasts and guides discuss handling techniques. Other forms of education should be used. Signs at local hardware stores and walmarts on catch and release should be funded.

4.4.1

opt b. We need to assume low recruitment.

4.4.2 Option b. This would allow greater flexibility in our ability to manage stocks and respond in accordance with scientific data.

4.6.2 Management Program Equiv.

Opt B. I believe strongly that conservation equivalency should be restricted based on stock conditions. CE adds risk and uncertainty to fisheries management. In the face of climate change this adds another layer. We must manage as one fishery with each state reducing in accordance with what it removes.

Option D

sub d3: An uncertainty buffer of 50% is essential given stressors of climate change.

Option E:

sub opt e2: We are looking at managing fisheries across the east coast. Those that catch more must reduce their catch accordingly. This is extremely important!

Thanks for reading this letter, I greatly appreciate what you do and the time taken to take our words into account. Please take the above measures and protect our fishery for generations to come.

Best,

Carl Johanson

**From:** [Liam Rosati](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass  
**Date:** Friday, April 15, 2022 4:05:33 PM

---

Dear Emilie,

This is Liam Rosati. I live in Connecticut, and I'm life-long recreational surf fisherman. I am writing you today because I am very concerned that the striped bass stocks are highly depleted and not nearly enough is being done to curb the decline or rebuild the fishery.

Below, please find the options I believe will yield the best results to the recreational fishers, short of a total moratorium on the taking of all striped bass (which I would support).

**Tier 1:**

Option A: Sub-option A-1

Option B: Sub-option B-1

Option C: Suboption C1

**Tier 2:**

Option A: Sub-option A2

Option B: Sub-option B1

Option C: Sub-option C1

**Tier 3:**

Option A : Sub-option A2

Option B: Sub-option B2

**Tier 4:**

Option B: Sub-option B1-a

Option C: Sub-option C3

Option D: Sub-option D2

Option E: Sub-option E2

Thank you for your time and considerations.

Regards,

Liam

Liam Rosati ><(((((\*>

PO Box 872, Old Lyme, CT 06371, USA

Tel 800-628-1447 (US) 860-434-9624

Fax 860-434-8605

Email: [Liam@angleradventures.com](mailto:Liam@angleradventures.com)

Website: [www.angleradventures.com](http://www.angleradventures.com)

Facebook: <http://facebook.com/angleradventures> Blog: <http://angleradventures.wordpress.com/>

**From:** [mark.phillips11@verizon.net](mailto:mark.phillips11@verizon.net)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Striped Bass Amendment 7 Comments  
**Date:** Friday, April 15, 2022 3:56:55 PM

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Greetings,

My name is Mark Phillips. I am a Rhode Island resident.

I have recreationally fished for Striped Bass for 29 years.

I am on Active Duty in the US Coast Guard and have over 18 years of service.

Currently, I serve as a Fisheries Instructor at the Northeast Regional Fisheries Training Center in Cape Cod, MA.

I have spent the majority of my career in the Coast Guard directly and or indirectly working in federal fisheries law enforcement, particularly Striped Bass enforcement in the EEZ. I have been stationed as an operator in Western Long Island Sound in NY, Central and Eastern Long Island in Connecticut, Block Island Sound in RI, and now on Cape Cod at the schoolhouse.

I support managing SB for abundance - not for the minimum population that we hope can maybe sustain itself while we continue to skim off the top. Whether anecdotally or from best available science, or careful naturalist observation, and most notably, my firsthand experience on the water throughout some of the most historic ASB habitat, it seems clear to me the SB population in the northeast (NE) is overfished, is in critical decline and requires aggressive, timely management action to rebuild and sustain. In addition to my comments listed below regarding Amendment 7, I wish to add one additional comment: Ending the gross negligence of all anglers, both harvest and targeted catch and release ASB fishing in the EEZ is paramount. The giant ASB "class" of breeders that summer over in the EEZ need rest. They are the last buffalo. Thank you.

Amendment 7 Comments:

4.1 Management Triggers

Tier 1:

I support Sub-Option - A1

I support Sub-Option - B1

I support Sub-Option - C1

Tier 2:

I support Sub-Option - A2

I support Sub-Option - B1

I support Sub-Option - C1

Tier 3:

I support Sub-Option - A3

I support Sub-Option - B2

Tier 4:

I support Option A (status quo)

4.2.2 Measures to Address Recreational Fishing Mortality

Option C - Additional Gear Restrictions

I support Sub-Option - C1

I support Sub-Option - C2

Opt. D

I support Sub-Option - D2

4.4 Rebuilding Plan

4.4.1. I support Option - B

4.4.2. I support Option - B

4.6.2. Management Program Equivalency

Opt. B - I support Sub-Option - B1a



Opt. C - I support Sub-Option - C3  
Opt. D - I support Sub-Option - D3  
Opt. E - I support Sub-Option - E2

Sincerely,  
Mark Phillips  
25 Fieldstone Way  
Westerly, RI 02891

**From:** [Matt Boutet](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7.  
**Date:** Friday, April 15, 2022 3:51:15 PM

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My overarching comment is that it's disappointing to see the ASMFC continue to strive for the bare minimum that could possibly have any hope of restoring the striped fishery. Instead of letting us comment on a host of barely-good-enough options, why not at least present the possibility of something that has a better than 50/50 shot at restoring the fishery?

I've included point-by-point comments below, but I've generally followed what the ASGA recommended, so it's safe to count this as a vote for their vision.

#### 4.1 Management Triggers

##### Tier 1: Fishing Mortality (F) Triggers

###### Option A: Timeline to Reduce F to the Target

I Support Sub-option A1 (status quo): Reduce F to a level that is at or below the target within one year.

###### Option B: F Threshold Triggers

I Support Sub-option B1 (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

###### Option C: F Target Triggers

I Support Sub-option C1 (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

##### Tier 2: Spawning Stock Biomass (SSB) Triggers

###### Option A: Deadline to Implement a Rebuilding Plan

I Support Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

###### Option B: SSB Threshold Trigger

I Support Sub-option B1 (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

###### Option C: SSB Target Trigger

I Support Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

### Tier 3: Recruitment Triggers

#### Option A: Recruitment Trigger Definition

I Support Sub-option A2: The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

#### Option B: Management Response to Recruitment Trigger

I Support Sub-option B2. If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

### Tier 4: Deferred Management Action

I Support Option A (status quo): No Deferred Management Action.

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

### 4.2.2 Measures to Address Recreational Release Mortality

#### Option C. Additional Gear Restrictions

I Support Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

I Support Sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

#### Option D. Outreach and Education

I Support Sub-option D2: It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

### 4.4 Rebuilding Plan

#### 4.4.1 Recruitment Assumption for Rebuilding Calculation

I Support Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

#### 4.4.2 Rebuilding Plan Framework

I Support Option B: 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 recruitment assumption specified in Amendment 7) 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.

#### 4.6.2 Management Program Equivalency (Conservation Equivalency)

##### Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status

I Support Sub-option B1-a: CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

##### Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals

I Support Sub-option C3: CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

##### Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries

I Support Sub-option D2: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

##### Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries

I Support Sub-option E2: the percent reduction/liberalization projected for the FMP standard at the state-specific level.

**From:** [Ken Manzari](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 3:50:59 PM

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Dear ASMFC,

My name is Ken Manzari and I am from the state of CT. Striped bass are important to me because not only do I get enjoyment from catching and releasing them, but more importantly, knowing that these fish are not endangered and stocks are healthy. I realize it is very difficult to balance the needs of both the recreational and commercial sectors. Simply, we must all make sacrifices to make sure these fish not only survive, but thrive!

Achieving those goals is the true measure of who we are as humans, who are the only species on this earth that can decide their future. Please do not let this stock collapse, again!! Even when these fish rebound, we can't let up. Do the right thing! I have read through and am in agreement with the position that the ASGA has taken, thus, the selections made below.

Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.4.1

TIER 1:

Support A1

Support B1

Support C1TIER 2:

Support A2

Support B1

Support C1TIER 3:

Support A2

Support B2TIER 4:

Support A4.2

None

Support C1, C2

Support D24.4.1

Support B4.4.2

Support B4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Ken

West Haven CT

Email: [manzari@att.net](mailto:manzari@att.net)

Sent from [Mail](#) for Windows

**From:** [Joshua Tabora](#)  
**To:** [Comments; stripercoments@gmail.com](#)  
**Subject:** [External] Striped Bass Fishing public comment  
**Date:** Friday, April 15, 2022 3:47:39 PM

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To whom this may concern,

I am a recreational fisherman in the greater Chesapeake bay region. It is my hope that fisheries managers will ammend current practices to reflect managing the stock for abundance, especially in regards to breeding size specimens. Please find my comments below:

#### 4.1 Management Triggers

Tier 1: Fishing Mortality (F) Triggers

Support Sub-option A1 (status quo)

Support Sub-option B1 (status quo)

Support Sub-option C1 (status quo)

Tier 2: Spawning Stock Biomass (SSB) Triggers

Support Sub-option A2

Support Sub-option B1 (status quo)

Support Sub-option C1 (status quo)

Tier 3: Recruitment Triggers

Support Sub-option A2

Support Sub-option B2.

Tier 4: Deferred Management Action

Support Option A (status quo): No Deferred Management Action.

#### 4.2.2 Measures to Address Recreational Release Mortality

Support option A. SQ

Support Sub-option C1

Support Sub-option C2.

Support Sub-option D2

#### 4.4 Rebuilding Plan

##### 4.4.1 Recruitment Assumption for Rebuilding Calculation

Support Option B

##### 4.4.2 Rebuilding Plan Framework

Support Option B

##### 4.6.2 Management Program Equivalency (Conservation Equivalency)

Support Sub-option B1-a

Support Sub-option C3

Support Sub-option D2

Support Sub-option E2

Thank you for your time and consideration.

Kind regards,

Josh Tabora

**From:** [Sean Cochran](#)  
**To:** [Comments](#)  
**Cc:** [C. LOUIS BASSANO](#); [Peter J. Clarke](#); [HEATHER CORBETT](#); [TOM FOTE](#); [KRISTOPHER M KUHN](#); [TIM SCHAEFFER](#); [LOREN W.LUSTIG](#); [WARREN ELLIOTT](#)  
**Subject:** [External] Striped Bass Amendment 7  
**Date:** Friday, April 15, 2022 3:26:00 PM

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Dear Commissioners,

I am writing to comment on the striped bass management amendment 7. I am originally a Pennsylvania native who is now a California resident but still frequently fishes for striped bass in New Jersey waters.

For me amendment 7 really boils down to two options, put additional safeguards in place and manage the fishery to once again attain the stock size and biomass targets of two decades ago, or lower the bar strip away protections and allow for greater stock exploitation. I favor the first more conservation-minded approach.

My preferences for Amendment 7 Measures are as follows:

Tier 1 Fishing Triggers

- A1 status quo
- B1 status quo
- C1 status quo

Tier 2 SSB triggers

- A2 2 years to formulate stock rebuilding plan
- B1 status quo
- C1 status quo

Tier 3 Recruitment Trigger

- A2 juvenile recruitment trigger
- B2 factor in low recruitment trigger when setting F in response to poor juvenile indices

Tier 4 deferred management

- Option A status quo

4.2.2 Measures to address recreational release mortality

- C1
- C2

4.4.1 Recruitment Assumptions for Rebuilding

- Option B rebuild to SSB by 2029

4.4.2 Rebuilding Plan Framework

- Option B adjust F target lower in event probability of 2029 rebuild is below 50% probability

4.6.2 Management Program Equivalency

- B1-a no use of CE when stock is overfished
- D2 use CE buffer of 25% for uncertainty

Thanks again for considering my comment.

Sean M Cochran

Sent from my iPhone





**From:** [Feini Yin](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 3:24:08 PM

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Hi there,

I'm a surfcaster who's fallen in love with striped bass over the last several years, mostly fishing catch & release with artificial lures in New Jersey. Talking with other recreational anglers and listening to stories from elders, it's clear the fishery is in dire trouble and we must take action now to reverse course and restore striped bass stocks to abundant & healthy levels. These fish bring so much joy, enrichment, and connection to nature to so many during times that are increasingly disconnected and digital. We owe it to these incredible creatures to be responsible and thoughtful stewards. I've tried to learn as much as I can and in my opinion, a moratorium on all harvest (recreational & commercial) is ultimately needed.

Below are my choices for Amendment 7, and again, I'm writing from New Jersey. Thank you for seeking public comment and acting quickly!

#### 4.1 Management Triggers

##### TIER 1 OPTIONS: Fishing Mortality (F) Triggers

- Sub-option A1 (status quo)
- Sub-option B1 (status quo)
- Sub-option C1 (status quo)

##### TIER 2 OPTIONS: Female Spawning Stock Biomass (SSB) Management Triggers

- Sub-option A2
- Sub-option B1 (status quo)
- Sub-option C1 (status quo)

##### TIER 3 OPTIONS: Recruitment Triggers

- Sub-option A3
- Sub-option B2

##### TIER 4 OPTIONS: Deferred Management Action

- Option A (status quo)

#### 4.2 Recreational Fishery Management Measures

##### Option B. Effort Controls (Seasonal Closures)

- Sub-option B2
- Sub-option B2-b

##### Option C. Additional Gear Restrictions

- Sub-option C1
- Sub-option C2

##### Option D. Outreach and Education

- Sub-option D1

#### 4.4 REBUILDING PLAN

##### 4.4.1 Recruitment Assumption for Rebuilding Calculation

- Option B

##### 4.4.2 Rebuilding Plan Framework

- Option B

#### 4.6 ALTERNATIVE STATE MANAGEMENT REGIMES

##### 4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option B. Restrict the Use of Conservation Equivalency Based on Stock Status

- Sub-option B1

##### 4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals

- Sub-option C3

##### 4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries

- Sub-option D3

##### 4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries

- Sub-option E2

Sincerely,  
Feini Yin

--

Feini Yin  
Program Administrator  
Pronouns: they/them

**FISHADELPHIA | Community Supported Fishery**

**W:** [www.fishadelphia.com](http://www.fishadelphia.com) **E:** [feini@fishadelphia.com](mailto:feini@fishadelphia.com) **P:** 908.745.9768



**From:** [Peter Jenkins](#)  
**To:** [Comments](#); [Emilie Franke](#); [Jason E. Mcnamee](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] A7 Public Comment - Peter Jenkins  
**Date:** Friday, April 15, 2022 3:20:16 PM

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Emilie Franke

Fishery Management Plan Coordinator

Atlantic States Marine Fisheries Commission

1050 North Highland Street, Suite 200A-N

Arlington, Virginia 22201

**RE: Atlantic Striped Bass Amendment 7 Public Comment Letter**

Dear Ms. Franke and Atlantic Striped Bass Management Board:

I am the owner of the Saltwater Edge a fishing tackle shop in Middletown, RI. I am also Chairman of the American Saltwater Guides Association an organization that believes healthy sustainable fisheries drive angler participation and therefore sales. I also serve on the Legislative Committee of The Rhode Island Saltwater Anglers Association (RISAA) which represents over 7,500 recreational anglers.

A healthy striped bass population is the linchpin to sustaining mine and other tackle shops along the striper coast. Striped bass are everyman's fish in that you can catch it from the beach, a kayak or a boat with bait, or lures, or flies and they are in our waters from April to November. Many of my customers were introduced to saltwater fishing by the striped bass.

According to data collected by the National Oceanic and Atmospheric Administration (NOAA) for the most recent year available, 2016, recreational fishing supported over 4,000 jobs and contributed over \$412 million to the Rhode Island economy. That's in comparison to a value of \$332 million for commercial fisheries. The economic contribution of striped bass to my shop and the recreational fishing economy in Rhode Island is difficult to understate.

I am very concerned for the ASMFC's ability as currently configured to manage the striped bass population in a sustainable manner. Being old enough to have fished through the last decline I also witnessed the subsequent rebound brought about by effective management. It was the shining star of fisheries management. I believe the current decline is largely because managers have yielded to political pressures by ignoring science and their own management triggers rather than looking out for the

best interest of rebuilding fish stocks. The striped bass recovery from the last moratorium demonstrates if we take care of the fish the fish will take care of us. ASMFC needs to look in the mirror and learn from the past.

As a small business owner reliant on healthy striped bass population. I can't see past the ridiculous and unchecked use of conservation equivalence by ASMFC. These proposals and resulting impacts rarely seem to be on target. The lack of accountability is truly astonishing. The striped bass resource (and associated businesses) would have been on the road to recovery by now if not for some flimsy CE claims. Now we are being forced to double down on the 2015 year class. A risky plan at best. Be aware there is considerable and growing public distrust in the ability of ASMFC to deliver on their mission of "leaving healthy and abundant marine fisheries for the next generation to enjoy"

I support the following options:

#### **4.1**

##### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

##### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

##### **Tier 3**

Option A- Support A2

Option B- Support B2

##### **Tier 4**

Support A

#### **4.2**

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D2

#### **4.4.1**

Support B

#### **4.4.2**

Support B

#### **4.6.2**

Option B- Support B1-a

Option C- Support C3

Option D- Support D2

Option E- Support E2

I appreciate the opportunity to provide comments. I do hope the Board seizes this opportunity to restore public trust and realize their mission of "leaving healthy and abundant marine fisheries for the next generation to enjoy"

Sincerely,

Peter Jenkins

Owner

The Saltwater Edge

Chairman

The American Saltwater Guides Association

**From:** [Jason Melecio](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Friday, April 15, 2022 3:16:10 PM

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**Good Afternoon,**

**My name is Jason Melecio and I am a teacher/dad/ocean lover. This is in response to the request for public comments of Amendment Seven for the management of Striped Bass.**

#### **4.1**

##### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

##### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

##### **Tier 3**

Option A- Support A3

Option B- Support B2

##### **Tier 4**

Support A

#### **4.2**

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D1

#### **4.4.1**

Support B

#### **4.4.2**

Support B

#### **4.6.2**

Option B- Support B1-a

Option C- Support C3

Option D- Support D3

Option E- Support E2

Thank for considering and allowing the public to post their opinion. I am a father of 2 and feel as though I have a duty to make to support striped bass. Please consider prioritizing building the stock of fish back.

Thanks you,

Jason Melecio

Jason Melecio jm5696@yahoo.com 516-242-6087



**From:** [Alec Griswold](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 3:13:42 PM  
**Attachments:** [Screen Shot 2021-11-30 at 1.46.36 PM.png](#)

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To the Advisors and Board members of the Atlantic States Marine Fisheries Commission:

As the head of Elevate Youth, a Boston based nonprofit, with the mission to create more opportunities for young people to experience the outdoors - I see Amendment 7 as a crucial moment to protect these fish for the next generation.

Protecting our striped bass stocks, safeguarding the recreational angling industry that relies on these fish, and ensuring that future generations of anglers can enjoy catching our coastal fishery are paramount to us. With this said, I wish to support the following options in the current Amendment 7 draft:

On 4.1 Management Triggers, we support:

Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality

Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold

Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions

Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, we support:

Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method

Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, we support:

Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. We recognize this option may require more restrictive management measures than option A, which we support

On 4.4.2 Rebuilding Plan Framework, we support:

Option B to allow the Board to take direct management actions as well as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, "Management

program equivalency (also known as “conservation equivalency” or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

We believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically, we support:

Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level

Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates

Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries

Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

Thank you for providing the opportunity to comment on Amendment 7. On behalf of the youth we serve, I encourage the Board to take the above steps and make a thoughtful investment for the next generation.

Sincerely,

Alec Griswold

Alec Griswold  
Executive Director  
**Elevate Youth**  
89 South Street, Suite 203  
Boston, MA 02111  
(o) 857.995.8050  
(c) 410.627.8066  
I.G. @elevate.youth.boston  
[www.elevateyouthoutdoors.org](http://www.elevateyouthoutdoors.org)



*We empower youth to reach their full potential through transformative outdoor experiences. Your support helps us spread our mission to more young people. [Donate today.](#)*

**From:** [Stewart Rosen](#)  
**To:** [Comments](#)  
**Subject:** [External] Striper recovery - Applaud all consecration efforts  
**Date:** Friday, April 15, 2022 3:10:54 PM

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To whom it may concern:

I've been a catch and release recreational angler since 1952, currently living in Northern NJ, one of the richest striped bass areas in the northeast. Primarily I fish Raritan Bay and the East River, eeling, plugging and jigging for bass. I've seen the bass, bluefish, weakfish and fluke populations fluctuate precipitously and conservation efforts rebounded those stocks. BTW, I release everything I catch and generally, because of the way I fish, nothing much dies at all - just 2 fluke last season.

In my experience slot limits are difficult to enforce, in fact, due to the lack of DEC boats I've seen there is little enforcement at all, certainly as regards to recreational boaters. 1 fish to 36" is a good compromise I think.

Stewart  
917-923-9995

**From:** [Dana Woulfe](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] ASMFC - comments on Amendment 7  
**Date:** Friday, April 15, 2022 2:53:30 PM

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My name is Dana Woulfe and I live in Essex, Massachusetts, Striped bass are very important to me and my town. We have a strong local fishing community that spends a great deal of time and money chasing these fish. Some make their living via guiding or tackle shops and some just pursue the fish passionately for recreational enjoyment like myself. I personally spend thousands of dollars per year at local shops on tackle and gear. All of the above (jobs and revenue) would be disappear if the fishery collapsed. I strongly believe action is required to save the breeding population of striped bass before it's too late.

Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2  
Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,  
Dana Woulfe

Essex,MA

[Dana.Woulfe@gmail.com](mailto:Dana.Woulfe@gmail.com)

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Dana Woulfe

[www.danawoulfe.com](http://www.danawoulfe.com)

[www.studiofreshboston.com](http://www.studiofreshboston.com)

**From:** [Ezra Hagerty](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 2:52:04 PM

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Dear ASMFC,

I am a saltwater fly angler based in Marblehead, MA. I learned to fish for striped bass six seasons ago and have fallen in love with the species. I target these fish 3-4 days a week starting in mid-May and ending in mid-October. Striper fishing has brought me so much joy and introduced me to such a wonderful community. Over the past few seasons, I've started to see a decline in our stock. During the summer of 2020, we had weeks of massive feeds with 40"+ bass eating at will. Last summer, we saw only a few days of that, my fear is that the commercial fleet harvested this biomass. Last season, lots of our go to spots were not holding fish. Fish were small and tough to come by. Something very out of the ordinary for me and other more seasoned local anglers.

I fear that if strong measures are not taken now, this wonderful species will be wiped out and not able to bounce back. They will go the way of cod and take generations to recover, if at all. We will not be able to responsibly fish for them. Our kids will never know the joy of catching their first schoolie, their first 40" and all of the wonderful catches in between.

I support the following options in the draft amendment:

- 4.1 Management Triggers:
  - Tier 1:
    - Option A: I support Sub-option A1
    - Option B: I support Sub-Option B1
    - Option C: I support Sub-Option C1
  - Tier 2:
    - Option A: I support sub-option A2
    - Option B: I support sub-option B1
    - Option C: I support sub-option C1
  - Tier 3:
    - Option A: I support sub-option A2
    - Option B: I support sub-option B2
    -
  - Tier 4:
    - Option A: I support Option A
- 4.2 Measures to address recreational release mortality:
  - I support support sub options C1, C2 and C
  - Option D: I support sub-option D2
- 4.4.1 Rebuilding Plan
  - I support sub-option B
- 4.4.2 Rebuilding Plan Framework
  - I support sub-option B
- 4.6.2 Management Program Equivalency
  - Option B: I support sub-option B1-a
  - Option C: I support sub-option C3
  - Option D: I support sub-option D2

- Option E: I support sub-option E2

Thank you for the consideration of these comments,  
Ezra Hagerty

--

Ezra Hagerty  
(802) 522-9032

**From:** [Michael Ames](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment seven  
**Date:** Friday, April 15, 2022 2:50:54 PM

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I want to speak to the pointed down striped bass population needs to be protected. As a part of this I would like to see a strip reduction on harvest. Operational harvest should be eliminated for the next few years all commercial harvest be reduced. Both of these should be closely monitored and heavily fine if violated. As a recreational fisherman catch and release allows us to enjoy our recreation and provide conservation for the sport that we enjoy. Those that are commercially harvesting fish also need to take part in conservation and reduce their harvest numbers in order for them to maintain their business long-term.

Michael Ames CI  
870-243-2637  
Sent from my iPhone



**From:** [Lloyd Kee](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 2:50:17 PM

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Dear Ms. Franke,

My name Lloyd Kee from Long Island, NY. I am very concerned with the present state of the striped bass fishery. I was a kid when the first decline happened in the 1980's. I remember going on many fishing trips and not catching a single striped bass. History is repeating itself. Over 10+ years I have seen the decline of the striped bass fishery again. I hope the ASMFC learns from the past and helps this magnificent fish thrive again. It would be shame if future generations never experience catching a striped bass again.

I support the following options:

**4.1 Management Triggers**

*Tier 1-Fishing Mortality Management Triggers*

Option A1

Option B1

Option C1

*Tier 2-Female SSB Management Triggers*

Option A2

Option B1

Option C1

*Tier 3-Recruitment Triggers*

Option A3

Option B2

*Tier 4-Deferred Management Action*

Option A

**4.2.2 Recreational Release Mortality**

Option A

Option C1

Option C2

Option D1

**4.4.1 Rebuilding Plan**

Option B

**4.4.2 Rebuilding Plan Framework**

Option B

**4.6.2 Management Program Equivalency**

Sub-Option B1a

Sub-Option B1c

Sub-Option B2b

Sub-Option C3

Sub-Option D3

Sub-Option E2

Regards,

Lloyd Kee  
Long Island, NY

**From:** [bucktail](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment 7  
**Date:** Friday, April 15, 2022 2:49:36 PM

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I strongly suggest when looking at Striped Bass regulations that you take a long hard look at data .Data clearly indicates the prime spawner is 28 -40" and maybe 44" ..As long as the regulations allow 1 fish between 28 -36" we are only removing prime females .I strongly believe the regulations should mirror the redfish regulations of 1 fish 18-28" but maybe add a bonus tag for a prime fish over 44" to assure recognition of a potential world record.. The current regulations will not allow the stock to return to previous highs and could easily result in further reduction in coast wide population... I strongly ask you to consider all the data available when making your decisions keeping in mind the prime spawners are 28-36" I look forward to some positive results as a result of your efforts

BILL SHILLINGFORD 21 PINWOOD CT SWAINTON ,NJ 08210  
EMAIL BUCKTAIL8@AOL.COM

**From:** [frank.madaia@gmail.com](mailto:frank.madaia@gmail.com)  
**To:** [Comments](#)  
**Cc:** [C. LOUIS BASSANO](#); [TOM FOTE](#); [HEATHER CORBETT](#); [Peter J. Clarke](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 2:49:34 PM

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To whom this may concern,

Hello my name is frank madaia, I am a 32 year old surfcaster from NJ. I consider myself a serious surfcaster fishing several days a week and detailing all my trips in my annual log books. It is apparent that striped bass fishery is in trouble. I'm writing in today to express my interest in seeing a management plan put into place that will help rebuild the striped bass population. A strong rebuilding plan is extremely important to me, 95% of the time I'm fishing it is for striped bass. My wife and I are expecting our first child this September a little boy. I'm afraid if nothing is done my ability to share my passion with him will be lost. Passing the pursuit of striped bass down to my children is extremely important to me. Please let's do our part as stewards of the land and sea to preserve what was given to us.

I'm also concerned the amendment only identifies a plan for recreational fisherman. Commercial fishing should be addressed in the immediate future!

Thank you,  
Frank madaia

Sent from my iPhone

**From:** [HeyJoe](#)  
**To:** [Comments; stripercomments@gmail.com](#)  
**Subject:** [External] Protect The Species Save The Fishery!  
**Date:** Friday, April 15, 2022 2:48:06 PM

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Greetings,

I hope this message finds each of you well and my greatest hope, is that this note will be considered and idea embraced.

To the meat of the matter, the economic impact that what I believe this sport fish ( the striped bass) has along the Striper Coast is profound .

Bait and Tackle shops from North Carolina to Maine will suffer greatly if the Striped Bass isn't regulated and protected.

Im originally from New Bedford , Massachusetts and I saw first hand what the Commercial Fishing Industry did to Cod Fish. Collectively we are headed in that same direction. A catastrophic outcome.

As much as I have come to love fishing for the Striped Bass in New England from the Surf and at times from the Cape Cod Canal, I find it time to do several things as soon as possible to not only protect the species but as well the fishing communities across the Northeast that impacts not only the Bait Shops but the coffee shops, the small business restaurants, gas stations etc;

1. Designate the Bass a Sports Fish.

No Commercial Harvesting of Striped Bass for Five years.

2. Limit recreational fish kept to Zero for 3 years unless the fish hasn't and can not survive a safe release back to the ocean.

3. Environmental Police Patrol increased at certain " hot spots" especially at night. The best fishing and fishermen, fish 10pm-6am for this fish and in my time fishing I have never seen an officer during these times. 6am? Yes! 3am? No.

4. When fishing licenses are authorized a pamphlet of the top diverse languages explaining the changes must be handed out:

Spanish, Loatian, Cambodian, Portuguese etc;

Also signs posted at the cash out register area of every bait shop stating the changes and the dire straits tge striped bass are in.

5. Lastly The Striped Bass must be Catch and Release only for a period of time as I stated above.

Make the hard decisions today in order to protect and provide enjoyment and economic stability for years to come. We can not continue in the direction we are currently in today. The children we say we love won't ever experience the joy we have had that this amazing species of The Striped Bass has Benefitted each one of over the years.

Regards,  
Joe Pereira

**From:** [Matt Pesce](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 2:45:34 PM

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Dear ASMFC,

My name is Matthew Pesce, I'm an attorney from the state of Connecticut and an avid angler. Striped bass are such a valuable resource and draw for this region—it would be such a shame if there was an opportunity to protect the population, but that the action taken was too tepid, too incremental, and too “wait and see”. I've pursued these fish for sport for many years now and I believe them to be one of the best and most alluring qualities of the NorthEast. They make for a valuable resource and a timeless pastime.

Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

#### **4.1**

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

#### **4.2**

None

Support C1, C2

Support D2

#### **4.4.1**

Support B

**4.4.2**

Support B

**4.6.2**

Support B1-a

Support C3

Support D2

Support E2

Here's to hoping that our voice will be heard.

Sincerely,

Matthew Pesce

Norwalk, Connecticut

[mattpesce@gmail.com](mailto:mattpesce@gmail.com)

**From:** [David Kaplan](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 2:44:54 PM

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Dear ASMFC,

My name is David Kaplan, I have fished in Massachusetts for over 70 years and watched the **availability of striped bass go from a complex** cyclical phenomenon to repeated crises of overfishing and regulatory concessions to commerce. It is tragic.

I fish for many species in a variety of habitats, but most enjoy careful catch-and-release striper fishing. I take one a year for the table. My greatest joy is in teaching children to fish for stripers. I hope that you will make every effort to salvage and restore this traditional and important recreational fishery.

As for public comments, I prefer the following Amendment 7 options:

For 4.1 - Tier 1, I support A!

Tier 2, A2

Tier 3, A2

Tier 4, A

For 4.2 None

4.4.1 - B

4.4.2 - B

4.6.2 B1-a



Please note these comments in your considerations.

I appreciate the opportunity to comment.

**David Kaplan**  
**781.258.5640**

**From:** [Kyleigh Bechard](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped bass management amendment #7  
**Date:** Friday, April 15, 2022 2:24:54 PM

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To whom it may concern,

My name is Kyleigh Bechard, and I love striped bass. They are an incredibly important species for both environmental health of our coastal ecosystems and for our coastal economies throughout their range. We need to do everything we can to help give these fish a voice. They MUST be protected.

For Tier 1: Fishing mortality (F) triggers  
for each option I would like to see the status quo. I believe this will offer the most efficient and helpful response to aiding striped bass

For Tier 2: SSB triggers  
For option A I would like to see management choose suboption A2  
For option B I would like to see management choose suboption B1 the status quo  
For option C I would like to see management choose suboption c1

For Tier 3: Recruitment triggers  
For option A I would like to see management choose suboption A2  
For option B I would like to see management to suboption B2

For Tier 4: Deferred management  
For this tier I would like to voice that I support option A for no deferred management. Deferred management is a terrible way to manage a fish stock that is already experiencing overfishing. Regulation must be uniform across state lines to prevent one state from overharvesting. This is especially necessary for a species like striped bass whose range extends from NC to ME.

I hope we can help the bass. They deserve it.

Thank you  
Let's save the stripers

**From:** [Johnny S](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 - Striped Bass  
**Date:** Friday, April 15, 2022 2:24:52 PM

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I can only imagine how complex an undertaking this will be for you all. I'm thankful for the opportunity to be heard, and for the opportunity of others to be heard, especially with how activating this can be for some. I've gone back and forth on what type of letter to send. I've looked through all of the options for measures, and lettered, numerical choices. I've read other peoples' and organizations' opinions and arguments. There are many, many. I truly appreciate your energy put towards this.

Where I've landed today, simply, is that I truly love and enjoy our NE Striped Bass fishery. The animal itself, and the qualities it possesses, makes to create so many experiences for all types of fisherman. I fish all over the world, and I own waterfront property on Cape Cod, and get to witness others in their excitement and love of the fishery, often. At the same time I also witness the abuses and ignorances. Personally, I will be targeting the resource less, and practicing less damaging ways of angling. What I imagine for the future, is a reliable resource, which is valued by all anglers, for all that it offers. As much I hope any measures taken, positively impacts the resource and its environment, I hope even more, that the measures, and communications, decided, bring together the angling community to realize the true value of a healthy resource and environment.

I'm sure you'll receive plenty of logical, methodical, thorough, and emotionally charged letters. I can only speak my experience, yet I'm sure underneath *all* of our wants and emotions, is simply the desire to create more amazing experiences with nature, and the people close to us we share it with.

Thank you. - John Stirpe

**From:** [John Mendelson](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 2:22:24 PM

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As a longtime angler, and one who got his start in the late 1980's on the Merrimack River when the striped bass population was just beginning to rebound to the previous collapse, I strongly suggest that the ASMFC take the hard decisions now to preserve the long-term health of the striped bass population. End or severely restrict the commercial fishery, make striped bass catch and release only for the recreational fishery, or significantly reduce the number of fish that can be taken per angler.

This is not easy, I get it, but I want my 10 and 13 year-old kids to be able to fish for striped bass when they are my age.

Sincerely,

John

John Mendelson  
Lincoln, MA  
(Former Mate on the Victor E III, mate on numerous commercial boats out of Newburyport, MA, former owner of Boston Fishstix Guide Service, and current recreational fisherman)

**From:** [Jeremiah Treanor](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [Michael Armstrong](#); [Dan Mckiernan](#); [Rep. Sarah K. Peake](#); [RAY@CAPECODFISHERMAN.ORG](mailto:RAY@CAPECODFISHERMAN.ORG); [RICK\\_JACOBSON@FWS.GOV](mailto:RICK_JACOBSON@FWS.GOV)  
**Subject:** [External] "Amendment 7"  
**Date:** Friday, April 15, 2022 2:21:48 PM

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To the ASMFC

My name is Jeremiah Treanor, I live in Weymouth MA. I am responding to the request for public comments on Amendment Seven for the management of striped bass.

I feel the striped bass stock has reached a dangerous low and proactive measures are required to stabilize and return it to an abundant status.

Here are my choices for each proposed regulation.

4.1

Tier 1

A1

B1

C1

Tier 2

A2

B1

C1

Tier 3

A2

B2

Tier 4

A

4.2

B- None

C1, C2

D2

4.4.1

B

4.4.2

B

4.6.2

B1-a

C3

D2

E2

Please think of the future generations when making your decisions. There is no reason stripers cannot be managed for abundance. These are iconic fish important to the history of our nation, and one of the few sporting fish available the average American angler.

Thank you

Jeremiah

**From:** [Richard Stanton](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 2:19:14 PM

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I support American Salt Water Guide Association positions on Amendment 7. Some further recommendations-

- Common regulations for boundary waters (eg points West from Sandy Hook to Breezy Point
- Focus on health of recruitment areas with an eye toward decreasing nutrient and sediment run off
- Keep up and or increase angler surveys. Enough anecdotal evidence eventually forms a pattern.
- Keep up the forage fish protection efforts. The menhaden resurgence has made for some very healthy adult striped bass.

I caught my first striped bass 40 years ago and have seen cycles come and go. It's my opinion that higher biomass always increases angler effort and therefor spend regardless of how strict mortality measures are.

**Richard G. Stanton**  
Stanton Company, since 1922  
49 N Mountain Ave  
Montclair, NJ 07042  
Cell: 917-536-8257  
[rstanton@stantonrealtors.com](mailto:rstanton@stantonrealtors.com)

[Stantonrealtors.com](http://Stantonrealtors.com) | [Lkn](#) | [Fb](#) | [Tw](#)

**From:** [Steve George](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 2:14:27 PM

---

Steve George  
109 Cove Court  
Barnegat NJ 08005

4/15/22

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

Dear Ms. Franke,

Thank you for considering my public comment about the Draft Amendment 7 to the Interstate Management Plan for the Atlantic Striped Bass.

Would love to see this striped bass fishery thrive in the future so my grandkids can enjoy fishing for them as much as I have for 40yrs.

This fishery needs to be managed in a timely matter as needed without any delays. .

I support the following Draft Amendment 7 options below(BCS Options fOr your convenience):

4.1 Management Triggers:

Tier 1-Fishing Mortality Management Triggers

- Option A1
- Option B1
- Option C1

Tier 2-Female SSB Management Triggers

- Option A2
- Option B1
- Option C1

Tier 3-Recruitment Triggers

- Option A2
- Option B2

Tier 4 Deferred Management Action



- Option A

#### 4.2.2 Recreational Release Mortality

- Option B-2a

- Option C1

- Option C2

- Option D2

#### 4.4.1 Rebuilding Plan

- Option B: Use low recruitment regime assumption

#### 4.4.2 Rebuilding Plan Framework

- Option B

#### 4.6.2 Management Program Equivalency

- Sub-Option B1a

- Sub-Option B2b

- Sub-Option B1c

- Sub-Option C3

- Sub-Option D3

- Sub-Option E2

Thank you again for your kind consideration.

Very Respectfully,

Steve George

Sent from my iPhone

**From:** [elbsmith91@gmail.com](mailto:elbsmith91@gmail.com)  
**To:** [Comments](#)  
**Subject:** [External] Protect our striped bass  
**Date:** Friday, April 15, 2022 2:12:26 PM

---

*Hello Emilie-*

*I am a recreational fisherman from Massachusetts, fishing primarily for Striped Bass in the waters of Cape Cod, Cuttyhunk, and Block Island. I am alarmed by the decline of Striped Bass stocks and the lack of recent overall spawning success.*

*I am also sickened by the selfish, disgusting behavior of those people who abuse this resource by poaching and practicing what is known as "high grading". People who intentionally take fish that are too small, take too many, or toss a dead fish into the water so they can keep a larger one. To see the white bellies of several dead 20 pound bass floating in the current of the Cape Cod Canal pushes one to a point beyond anger.*

*I believe that we cannot only blame others nor demand sacrifices from only those who fish differently or in other geographical areas than we do. Traditionally, recreationalists blame the commercials, surf guys blame the boat guys, beach guys blame the Canal guys, we all need to bear a part of the blame and be part of the solution.*

*I strongly support a slot limit for Striped Bass but believe that the current 28" minimum does not give enough fish the needed spawning time. A 28" minimum only allows 3 years of spawning time while a 31" minimum would allow 4 - 5 years for a Bass to spawn before possibly being killed. I support a 31" - 35" slot limit. This slot limit should be enforced uniformly all along the Atlantic Coast. To allow different regulations on a migrating fish is ludicrous.*

*As a Massachusetts and Cape Cod Canal Fisherman, I support the present regulation of no commercial fishing in the Canal. I also believe that the Cape Cod Canal should be catch and release only, but that is probably a discussion for another day. The fish are just too vulnerable in that stretch of water, particularly the larger fish.*

*As far as commercial regulations go, I understand allowing commercial fishermen to take a greater number of fish than recreational fishermen. What I don't understand is allowing them to take large numbers of the larger fish. This is absolutely counter productive to the goal of improving spawning success of the Striped Bass bio mass. The larger fish need to be saved, not killed. This seems like a sellout by regulators to me.*

*I support the use of circle hooks when bait fishing and I started using them several years ago to avoid the gut hooking of fish that happens when using J hooks.*

*I strongly support making Striped Bass a sport fish that can be taken by rod and reel only. I am haunted by the massive hauls of large bass that I see as a result of shore based netting from some areas of the Atlantic Coast. Certain historical methods of fishing, such as the fish weirs we see in Cape Cod Bay, or the nets off the West Wall in Rhode Island, are glamorized and declared a never ending right for those who now take more than their share at a time when the resource can not withstand that amount of reduction. I have seen this pattern repeated multiple times in the fishing industry. The resource is overfished by those who are in it for the quick buck without any regard for sustaining the fishery. Then they all*

*cry poor and ask for government subsidies when there are no more fish to catch. Swordfish, Cod, Flounder, Menhaden and large Blue Fin Tuna have all been decimated in this way. Fishermen don't have a perpetual right to fish a certain way just because their great, great Grampa did that 100 years ago. If that argument was used in the business world the government would be subsidizing the production of 8 track tapes!*

*I also can not understand why the Striped Bass are allowed to be hammered all winter long as they hold off the mid Atlantic Coast. They are exceedingly vulnerable. We have all seen the photo of the young woman sitting on top of the pile of huge Striped Bass as the charter boat makes it's way back to port. The excess is disgusting!*

*I support the restriction of fishing for Striped Bass in spawning areas during the time of year they are spawning. It makes no sense to cause stress or eliminate large Bass full of eggs before they have a chance to spawn.*

*I recognize that banning commercial striped bass fishing is unrealistic but if you want this fish to survive then you must.*

*Thank you for your attention,*

*Eli Smith*

Sent from my iPhone

**From:** [Parker Corbin](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 2:11:35 PM

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Dear ASMFC,

I write this letter as concerned father, conservationist and someone who love fishing for striped bass. Please consider the next generations of anglers as you finalize Amendment 7. I have three daughter (8, 10 & 12) whom I would like to be able to take striper fishing for many years as I have with my father. Many great memories come from striped bass fishing at all hours of night and early morning departures - these are a special fish that need protection. Please manage the fishery for abundance, ensure there is a sound rebuilding plan, get rid of conservation equivalency educate people on how to properly release striped bass. These fish are an amazing resource for all of us along the East Cost and should be treated with the greatest respect to be restored in robust numbers. The stock is too low and I see it when I am on the water fishing myself or with guides. We can not wait to rebuild the fishery.

My thoughts on Amendment 7 are below.

#### 4.1 Management Triggers

Tier 1: Fishing Mortality (F) triggers

Option A: Timeline to Reduce F to the Target - Sub-Option A1 - status quo

Option B: F Threshold Triggers - Sub-option B1 - status quo

Option C: F Target Triggers - Sub-option C1 - status quo

Tier 2: SSB Triggers

Option A: Deadline to Implement a Rebuilding Plan - Sub-option A2

Option B: SSB Threshold Trigger - Sub-option B1 - status quo

Tier 3: Recruitment Triggers

Option A: Recruitment Trigger Definition - Sub-option A2

Option B: Management Response to Recruitment Trigger - Sub-option B2

Tier 4: Deferred Management Action - Option A - status-quo

4.2.2 Measures to Address Recreational Release Mortality - B2-b - no harvest in spawning areas + Sub-option C1 & C2

Option D. Outreach and Education -

Sub-option D2

4.4 Rebuilding Plan - Critical that we have a rebuilding plan

4.4.1 Recruitment Assumption for Rebuilding Calculation - Option B

4.4.2 Rebuilding Plan Framework - Option B

4.6.2 Management Program Equivalency - Do not use Conservation Equivalency as a management tool, this a coastal species not a state species

Thank you for your consideration of these views.

-Parker Corbin

Greenwich, CT

From: [Kieran Alessi](#)  
To: [Comments](#)  
Subject: [External] Draft Amendment 7  
Date: Friday, April 15, 2022 2:07:41 PM

---

Hi there,

I'm a catch and release surfcaster. I've been plugging New Jersey's waters for striped bass over the past 5 years. The culture of fishing is one critical avenue we have to get people aware and engaged in our environment. I'm concerned about the future of our fishery and I believe recreational anglers like myself have a responsibility to shift our behaviors towards restoring it. Timely, enforceable regulations are a critical and overdue part of that shift.

**Below are my choices for Amendment 7, New Jersey is where I live. Please act quickly, thank you!:**

**4.1**

Tier 1

A1

B1

C1

Tier 2

A2

B1

C1

Tier 3

A2

B2

Tier 4

A

**4.2**

B-None

C1, C2

D2

**4.4.1**

B

**4.4.2**

B

**4.6.2**

B1-a

C3

D2

E2

Sincerely,  
Kieran Alessi

**From:** [Andrew shelhorse](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Striped Bass Comments to Amendment 7  
**Date:** Friday, April 15, 2022 2:06:36 PM

---

Dear ASMFC,

My name is Andrew Shelhorse and I am from the state of NY. Striped bass are important to me because As someone who has fished Long Island beaches for Striped Bass for the last 15 years I have experienced the Striped Bass decline first hand and fear that without immediate and drastic changes, the fishery will disappear. I typically fish over 100 trips per season and exclusively practice catch and release. Ten years ago, there were many days and nights that we caught and released multiple Striped Bass over 30". Now we are lucky to get a couple of 30" fish for the whole season. I've never objected to those taking legal limit of Striped Bass, but we are in a state of emergency and must make changes now. I commented on the options below but I personally believe that the changes should be even more aggressive.

Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

---

4.1

TIER 1:

Support A1

Support B1

Support C1

---

TIER 2:

Support A2

Support B1

---



Support C1

---

TIER 3:

Support A2

Support B2

---

TIER 4:

Support A

---

4.2

None

Support C1, C2

Support D2

---

4.4.1

Support B

---

4.4.2

Support B

---

4.6.2

Support B1-a

Support C3

Support D2

Support E2

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Thank you for the opportunity to comment, and I hope that my voice will be heard.

---

Sincerely,

---

Andrew Shelhorse

East Setauket NY

Ajshelhorse@gmail.com

Sent from my iPad

**From:** [Asa Smith](#)  
**To:** [Comments](#)  
**Subject:** [External] Comments for Striped Bass Management  
**Date:** Friday, April 15, 2022 2:04:57 PM

---

Hello,

I am a recreational fisherman from Massachusetts, fishing primarily for Striped Bass in the waters of Cape Cod, Marthas Vineyard, Nantucket and Cuttyhunk. I am alarmed by the decline of Striped Bass stocks and the lack of recent overall spawning success.

I am also sickened by the recent ability for pair trawlers to operate in waters so close to the areas that so many have used recreationally for decades. By destroying the baitfish, we have surely seen negative effects on the overall fish stocks over the past decade.

I strongly support a slot limit for Striped Bass but believe that the current 28" minimum does not give enough fish the needed spawning time. A 28" minimum only allows 3 years of spawning time while a 31" minimum would allow 4 - 5 years for a Bass to spawn before possibly being killed. I support a 31" - 35" slot limit. This slot limit should be enforced uniformly all along the Atlantic Coast. To allow different regulations on a migrating fish is ludicrous.

As a Massachusetts Fisherman, I support the present regulation of no commercial fishing in general. I also believe that the Cape Cod Canal should be catch and release only, but that is probably a discussion for another day. The fish are just too vulnerable in that stretch of water, particularly the larger fish.

As far as commercial regulations go, I understand allowing commercial fishermen to take a greater number of fish than recreational fishermen. What I don't understand is allowing them to take large numbers of the larger fish. This is absolutely counter productive to the goal of improving spawning success of the Striped Bass bio mass. The larger fish need to be saved, not killed. This seems like a sellout by regulators to me.

I support the use of circle hooks when bait fishing and I started using them several years ago to avoid the gut hooking of fish that happens when using J hooks.

I strongly support making Striped Bass a sport fish that can be taken by rod and reel only. I am haunted by the massive hauls of large bass that I see as a result of shore based netting from some areas of the Atlantic Coast. Certain historical methods of fishing, such as the fish weirs we see in Cape Cod Bay, or the nets off the West Wall in Rhode Island, are glamorized and declared a never ending right for those who now take more than their share at a time when the resource can not withstand that amount of reduction. I have seen this pattern repeated multiple times in the fishing industry.

The resource is overfished by those who are in it for the quick buck without any regard for sustaining the fishery. Then they all cry poor and ask for government subsidies when there are no more fish to catch. Swordfish, Cod, Flounder, Menhaden and large Blue Fin Tuna have all been decimated in this way. Fishermen don't have a perpetual right to fish a certain way just because their great, great Grampa did that 100 years ago. If that argument was used in the business world the government would be subsidizing the production of 8 track tapes!

I also can not understand why the Striped Bass are allowed to be hammered all winter long as they hold off the mid Atlantic Coast. They are exceedingly vulnerable. We have all seen the photo of the young woman sitting on top of the pile of huge Striped Bass as the charter boat makes it's way back to port. The excess is disgusting!

I support the restriction of fishing for Striped Bass in spawning areas during the time of year they are spawning. It makes no sense to cause stress or eliminate large Bass full of eggs before they have a chance to spawn.

Thank you for your attention,

Asa Smith

West Dennis, MA

**From:** [Jim Mize](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 2:01:53 PM

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Good afternoon,

I write to you today with my concerns for the striped bass and Draft amendment 7.

As a long time striped bass angler, here in the North shore of Massachusetts and New Hampshire, there has been an obvious decline in the numbers of adult size, (greater than 28 inches) over the last decade.

I stand with any conservation measures that are fair and equitable to both the fishery and angler alike.

These are the options I am in favor of.

Tier 1: Fishing Mortality (F) triggers.

Sub Option A1 (status quo)

Sub Option B1

Sub Option C1

Tier 2 : Spawning Stock Biomass Triggers

Sub Option A1

Sub Option B1

Sub Option C2

Tier 3 Recruitment Triggers

Sub Option(s) A2 , B2,

Deferred Management Plan

Option A

Additional Gear Restrictions:

Sub Option C1, C2,

Outreach and Education:

Sub Option D2

Recruitment and Assumption For Rebuilding Calculation:

Option B

Rebuilding Plan Framework:

Option B

Management Program Equivalency

Sub Options B1 C3 & D2

Thank you for allowing my input.

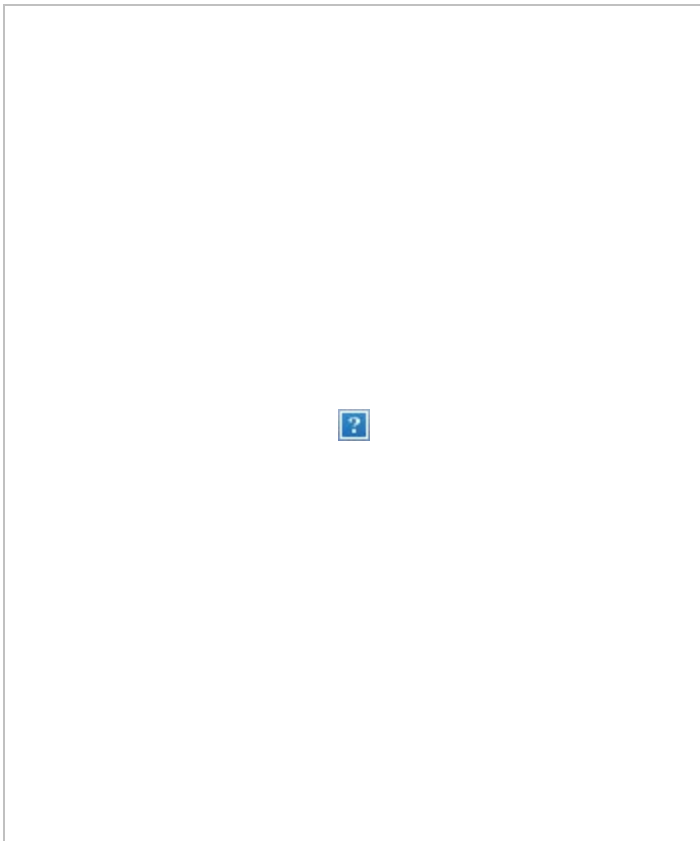
Sincerely,

***Capt. Jim Mize***

[Northeast Bluefin Showdown](#)

July 9-16, 2022

(603) 234-5932



**From:** [Cory Crochetiere](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 2:01:33 PM

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To Whom It May Concern-

To start, Ill introduce myself.

My name is Cory Crochetiere. I have lived in southwest CT for my entire life. I currently run a large marina in Westport (20yrs at the same company). I am also a full time captain from May to November. I run charters for both striped bass and bluefin tuna. I have been fishing for striped bass in my local waters since I was 4 years old. I used to fish with my uncle on his 16ft wooden dory in Long Island Sound. I fished with him on the weekends up until the age of 15 or so.

I can vividly recall the times when I was in elementary and middle school, where we would go out and catch striped bass from sunup to the time we would head in around mid-day. I remember the fall run where we would boat over 100 fish in a single trip, of all sizes. We use to chase bunker pods that seemed to have never ending 40" fish chasing them.

Sadly enough, you fast forward to my days as an adult, running my own boats; and the fishing fails to compare to how it used to be. I just turned 40 last year, and I have been running my own boats since the age of 23 in my local waters. I also trailer my boat all over New England as the season progresses, following the migration of the striped bass. Cape Cod to Montauk to the Throgs Neck bridge, and every where in between. Even when I compare the fishery when I first started fishing on my own boats, its an obvious large decline in what seems to be every year class of striped bass. Everything from the schoolies all the way up to the large breeding fish nearing 50".

I have been following the American Saltwater Guides Association rather closely for the last few years. So much of what they are trying to do, hits close to home; so to speak. Something needs to be done to preserve this fishery. Someone needs to act. Voices need to be heard. And before its too late.

I for one, stand behind all of their conservation efforts. We need to protect these fish, moreso now than ever before. With the increase of anglers on the water in the last decade, and more commercial pressures than the past, the striped bass population is taking quite a hit.

Lets all stand together, and make the corrections now, so we have a strong fishery for years to come.

--

Thanks and have a great day,

Cory Crochetiere  
**All Seasons Marine Works**  
609 Riverside Ave.  
[Westport, CT 06880](#)

Certified Yamaha Master Technician  
USCG MMC 50GT Licensed Master Captain

203-222-9038 office  
203-221-1503 fax

[All Seasons Marine Works](#)  
[Regulator Marine](#)  
[Pursuit Boats](#)  
[Robalo Boats](#)  
[Yamaha Outboards](#)



**From:** [Jimmy Fee](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 1:59:55 PM

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

SUBJECT: Draft Amendment 7

I am a Massachusetts resident and the editor of On The Water Media, which includes On The Water Magazine, On The Water TV, the Striper Cup tournament, and the StriperFest celebration.

On The Water was launched on Cape Cod in 1996 and has grown for the past 26 years to cover all waters where Atlantic striped bass swim. Like so many other fishing (and tourism) related businesses in our region, our existence depends upon the abundance of striped bass. There is perhaps no better example than our Striper Cup, which is a catch-and-release tournament that has attracted national sponsors and grown to nearly 6,000 participants.

I am writing as a private angler who began fishing recreationally for striped bass in New Jersey in 1996, and have since travelled between Maine and North Carolina in pursuit of these fish. My comments are not being made on behalf of my employer. As a striped bass angler, I support balancing precautionary management with regulatory stability and reasonable access. To achieve that, I support the following options.

### **Section 4.1 Management Triggers**

#### Tier 1: Fishing Mortality Triggers

Timeline to Reduce F to the Target: **I support Sub-option A1** (status quo)

F Threshold Trigger: **I support Sub-option B1** (status quo)

F Target Trigger: **I support Sub-option C1** (status quo)

#### Tier 2: Female Spawning Stock Biomass Triggers

Deadline to Implement a Rebuilding Plan: **I support Sub-Option A2**

SSB Threshold Trigger: **I support Sub-option B1** (status quo)

SSB Target Triggers: **I support Sub-option C1** (status quo)

#### Tier 3: Recruitment Triggers

Recruitment Trigger Definition: **I support Sub-option A2** (Moderate Sensitivity)

Management Response to Recruitment Trigger: **I support Sub-option B2**

#### Tier 4: Deferred Management Action

Deferred Management Action, **I support Option A** (No deferred management action)

### **Section 4.2.2: Measures to Address Recreational Release Mortality**

Seasonal closures: **I support Sub-options B2 Spawning Area Closures.** But, I urge the board to be mindful of the economic benefits of spring fisheries and the difficulty in enforcing no-targeting closures. If no-targeting closures are used, they need to be measurable, justified, and apply to both sectors.

Gear restrictions: **I support Sub-options C1 and C2**

Outreach and Education: **I support Sub-option D1**

#### **Section 4.4 Rebuilding Plan**

Recruitment Assumption for Rebuilding Calculation: **I support Option B**

Rebuilding Plan Framework: **I support Option B**

Management Program Equivalency: **I support Sub-options B1-A and B1-C, C3, and D1.**

Definition of Equivalency: I am supportive of constraints on CE and recommend referring this to the subgroup of ASMFC's management and science committee working on revisions to the broader CE policy to further consider its implications and provide further analysis of the performance of CE programs relative to coastwide measures to help better inform this discussion.

Thank you for the opportunity to share my thoughts on this important issue.

#### **Jimmy Fee**

Editor

On The Water

707 Teaticket Highway, E Falmouth, MA 02536

508-548-4705 x228



**From:** [Josh Givelber](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Friday, April 15, 2022 1:58:49 PM

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Dear Sirs/Madames:

My name is Joshua Givelber from New Jersey and I am responding to the request for public comments on Amendment Seven for the management of striped bass. I am by no means an expert on fishery management, but am an avid striped bass fisherman. I am a surfcaster and practice almost exclusively catch and release.

Here are my choices for each proposed regulation.

**4.1**

**Tier 1**

A1

B1

C1

**Tier 2**

A2

B1

C1

**Tier 3**

A2

B2

**Tier 4**

A

**4.2**

B- None

C1, C2

D2

**4.4.1**

B

**4.4.2**

B

**4.6.2**

B1-a

C3

D2

E2

I would strongly urge you to manage the fishery not for sustainability, but for abundance. The risks of being too conservative on the harvest seem much less severe than being too aggressive, so please err on the side of caution.

I know there are commercial fishing interests and hate to infringe on their ability to make an earning, but at the same time, striped bass fishing has a large dedicated cadre of recreational fisherman as well, and we support an eco-system of equipment manufacturers, lure builders, tackle shops, etc. that also need to survive. In addition, the SB fishery provides countless hours of fun (and frustration) for a huge number of recreational fisherman. It is all of our resource and one that we should be careful and cautious in ensuring that it not only survives, but thrives.

As a shore based mid Atlantic based surf fisherman, the striped bass is what we pursue. The NJ fishery can be very hit and miss, and with declining numbers, this is particularly felt by those of us that fish off the beach. I and many off my fellow surfcasters are very conscientious in trying to reduce fish mortality through crushing barbs and eliminating some hooks on lures, minimizing the time the fish leaves the water, making sure the fish is revived before releasing, and ending "kill" tournaments, but these efforts do little good without stronger regulation.

Please stand up for the striped bass, and end overfishing as quickly as possible. Please manage stripers for abundance, and not yield!

Thank you

Josh Givelber

Sent from [Mail](#) for Windows

**From:** [Sumner Pingree](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [Emerson Hasbrouck](#); [Maureen Davidson](#); [CAROL HOFFMAN](#); [James Gilmore](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 1:57:19 PM

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Dear ASMFC,

I am a long-time resident of Southampton Town, New York, and avid light tackle (mostly flyrodding) angler fishing the in-shore waters east of the Shinnecock Canal, including the Peconics, Gardiner's Bay, Montauk, Block Island to Martha's Vineyard. My interest is strictly recreational and I operate mostly from a 22-foot center console. Of course, striped bass are a primary target. Being almost 70 years old, growing up fishing the waters around Cape Ann, MA, I have lived to experience some of the striper fishery's lowest years, as well as its remarkable rebound through the late 80s and 90's.

I write because this is a critical juncture once again for these wonderful fish, and ASMFC needs to take decisive action to correct a decline that, in my opinion, has been largely caused by mismanagement. Having said this, I acknowledge that our fast changing environment (climate) is bringing new stressors on the bass reproduction/recruitment. And, similarly, the high mortality of catch-and-release fish is a reality that needs to be better understood as part of the larger management plan.

#### **4.6.2 Mgmt Program Equivalency**

My concern about mismanagement mostly involves the abuse of the Conservation Equivalency (CE) process by a number of states. As a "management tool", it has actually limited the recovery of the coastal stock, with certain large year classes being overfished. In this regard, I support the recommendations proposed by the ASGA for Option B, specifically sub-option B1-a: **CE programs would not be approved when the stock is at or below the biomass threshold; CE programs would not be considered until a subsequent assessment indicates biomass is above the threshold level.** Restricting the use of CE based on stock status is the most important correction to make if we are going to manage the fishery for abundance.

#### **4.4.1 Recruiting Assumption**

Going forward, ASMFC needs to assume rebuilding under a "low recruitment regime"! So, **I urge Option B.**

#### **4.4.2 Rebuilding Plan**

**Support Option B:** We need to be able to act quickly if the 2022 stock assessment results indicate Amendment 7 measures have a less than

50% probability of rebuilding the stock by 2029. The Board needs to be able to adjust measures (via Board action) to achieve F rebuild. Rather than continue with more delays, this option allows ability to adjust removals before the 2023 season.

#### **4.2.2 Release Mortality**

As a recreational angler, of course, **I support sub-options C1 & C2** to help address release mortality.

Striped bass stocks are in freefall. We should already be well into a rebuilding plan, but inaction by the Striped Bass Mgmt Board and poor recruitment in the Chesapeake has the fishery facing disaster. Anglers and the fishing economy throughout the entire range of the striped bass requires a strong conservative and conservationist basis for the Striped Bass Amendment 7.

Thank you for your consideration of these comments.

Respectfully,

Sumner Pingree  
40 Noyac Harbor Rd.  
Sag Harbor, NY 11963  
631-902-6134

**From:** [Merritt White](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 favorable options  
**Date:** Friday, April 15, 2022 1:56:09 PM

---

My name is Captain Merritt White Jr. and I am a resident of Suffolk County, New York.

I am a professional fly and light tackle fishing charter captain on the eastern end of Long Isle..

Striped bass have literally been my life blood since choosing this career path over twenty years ago. As a child growing up in the seventies and the eighties, I witnessed firsthand the decline of the striped bass through the dark moratorium years.

As I got older and held jobs in the tackle industry and had more access to boats I witnessed the miraculous recovery of the striped bass from the nineties and the first decade of the millennium.

To my dismay, in this latest decade, I have witnessed yet again another downward decline in our striped bass fishery.

It is absolutely vital that we, management and recreational anglers alike, spring into action to protect and bring back the striped bass stocks to a sustainable, abundant and diversified age class structure.

Concerning amendment 7, I support the following options:

4.1 Management Triggers

Tier 1, Options: A1, B1 and C1

Tier 2, Options: A2, B1 and C1

Tier 3, Options: A2, B2

Tier4, Options: A

4.2 Measures addressing release mortality

Options: C1, C2 and D2

4.4.1 Recruitment Assumptions for rebuilding calculations:

Option: B

4.4.2 Rebuilding framework

Option: B

4.6.2 Management Program Equivalency

Options: B1-A, C3, D2 and E2.

Let us all do the responsible thing and protect the intrinsic rights of this, America's fish, the striped bass, resulting in a thriving population that will be enjoyed by future generations of recreational anglers to come.

Thank you for your attention to this most important and urgent issue facing us today and for decades to come.

Sincerely, Captain Merritt White Jr.

Sent from my iPhone

**From:** [Mike DiSanto](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Striped Bass Management  
**Date:** Friday, April 15, 2022 1:53:01 PM

---

Dear ASMFC,

My name is Mike DiSanto and I am from the state of Massachusetts. Striped bass are important to me because as a recreational fisherman and plug builder I would hate to see another moratorium imposed but I feel we are headed in that direction if we do not act now.

Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Mike DiSanto



Westfield, Massachusetts  
Mikescustomplugs@comcast.net  
Sent from my iPhone

**From:** [Joseph Rogers](#)  
**To:** [Comments](#)  
**Subject:** [External] Save the striped bass  
**Date:** Friday, April 15, 2022 1:51:52 PM

---

Hello Emilie,

My name is Joseph Rogers, I am a year round resident of Martha's Vineyard and a life long recreational striped bass fisherman. Born in '85 I have seen many phases of this fishery. Starting with the 36" length that I was almost never able to catch, then 32", then 28" and then two fish at 28". As a person who use to harvest and eat striped bass often I have completely changed my ways to catch and release in an effort to do what I can to help the numbers as we'll as not target the large breeder females for recreation purposes. I would like to see any action possible to protect these fish and increase the numbers to a healthy sustainable population that will last for generations. I have switched to mostly fly fishing as well which tends to have an amazing hook placement and I find I have 0 accidental deaths or 0 mortality, using live bait for large fish often has negative consequences and I would gladly never use a bait to catch a striped bass ever again, some people do not posses the skill to fish without bait but they can learn. We all need to do anything possible to protect striped bass and keep them around for as long as we can. Please do anything you can to protect this amazing game fish.

Sincerely,  
Joseph Rogers.  
774-930-5811

**From:** [Matthew Robertson](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 1:39:38 PM

---

Hello,

Regarding Amendment 7. I believe it's very important that we not only recover the Striped Bass population to the existing SSB thresholds, but also ensure we avoid the need to have significant recovery efforts ever again. The value of the striped bass is too significant to let any one state or any generation take more than their fair share. This is a public resource we need to restore and then preserve for all to enjoy and benefit from.

For this reason, I have the following positions:

**Regarding 4.1 management triggers:**

Tier 1 F triggers

Option A - I support the status quo, sub-option A1.

Option B - I support the status quo, sub-option B1

Option C - I support the status quo, sub-option C1.

Tier 2 SSB triggers

Option A - I support sub-option A2 - a 2 year deadline must be defined

Option B - I support sub-option B1, status quo to rebuild within 10 years

Option C - I support sub-option C1, action to adjust the management program if SSB falling below threshold

Tier 3 Recruitment Triggers

Option A - I support sub-option A2. We need to act if recruitment is struggling

Option B - I support sub-option B2. We need to act in accordance with the potential for low recruitment in mind.

Tier 4 Deferred Management Plan

Option A - I support Option A - status quo - There is no need to delay action as the process is already quite lengthy. We are still pending action from the 2019 assessment.

Regarding 4.2.2 Measures to Address Recreational Release

Option C - I support sub-option C1 - There is no need to use anything other than non-lethal device.

Option C - I support sub-option C2

Option D - I support sub-option D

**4.4 Rebuilding Plan**

4.4.1 Recruitment Assumptions for rebuilding

Option B I support Option B

4.4.2 Rebuilding Plan Framework

I support Option B - this should enable the action needed in the time required to start to rebuild the stock as soon as possible.

#### **4.6.2 Management Program Equivalency**

Option B - I support sub-option B1-a. We need to have coherent and consistent regulations across the coast, especially when the stock is at or below biomass thresholds.

Option C - I support sub-option C3. We need to utilize reliable data to ensure the protection of the stock and ensure all states are contributing

Option D - I support sub-option D2. Put a buffer in to account for the uncertainty provided from smaller data sets.

Option E - I support sub-option E2

Thank you very much,

Matthew Robertson

**From:** [Brendan Byrne](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7 Comments  
**Date:** Friday, April 15, 2022 1:35:53 PM

---

There are hard decisions in life that must be made for the common good. Your vote on this amendment can help or harm the future of our fishery - please choose wisely.

Please consider my comments below:

#### 4.1 FISH MORTALITY TRIGGERS:

##### TIER 1

###### OPTION A:

PLEASE VOTE FOR OPTION A1

We need to Reduce F below the target level within one year. There is NO time to waste.

###### OPTION B:

PLEASE VOTE FOR OPTION B1

We need these decisions to be in sync. We need to be at or under the target in the timeline selected in Action A

###### OPTION C:

PLEASE VOTE SUB OPTION C1

Again why wait to take action ????

---

##### TIER 2 SPAWNING STOCK SSB

###### OPTION A

PLEASE VOTE SUB OPTION 2

Again WHY wait?. We need a tight deadline to take corrective action and 2 years already seems like a long time.

###### OPTION B

PLEASE VOTE FOR SUB B1

We need to at least keep this timeframe - I would argue for aggressive measures but this is a minimum.

###### OPTION C

PLEASE VOTE FOR SUB C1

Mortality is a critical component and this option can be corrective action

---

##### TIER 3 RECRUITMENT TRIGGERS

###### OPTION A

PLEASE VOTE FOR SUB A2

WE NEED STRONG RECRUITMENT CLASSES OF FISH - IT IS OBVIOUS BUT CRUCIAL

OPTION B  
PLEASE VOTE FOR SUB B2

One thing affects the other. If you want to get in shape don't eat pizza while walking on the treadmill and epoxy results.

---

TIER 4 DEFERRED MANAGEMENT PLAN

OPTION A  
KEEP IT AS IS!

We must respond to data! not a calendar of when the previous action was taken

---

OPTION C ADDITIONAL GEAR RESTRICTIONS  
OPTION C  
PLEASE SUPPORT SUB OPTION C 1 & C2

Striped bass needs to be treated with care. I've seen some crazy shit. Please please put stronger guidelines in place

If someone catches a striped bass using an unapproved method they MUST put it back with care

---

OPTION D OUTREACH AND EDUCATION

OPTION D  
PLEASE VOTE / SUPPORT SUB OPTION D2

PEOPLE NEED TO KNOW THE IMPORTANCE OF HANDLING FISH CORRECTLY

---

4.4.1 RECRUITMENT ASSUMPTIONS

OPTION B  
PLEASE SUPPORT / VOTE OPTION B

Please support our girls. 2029 is very achievable if the correct guidelines are in place

---

4.4.2 REBUILDING PLAN FRAMEWORK

OPTION B  
PLEASE SUPPORT / VOTE FOR OPTION B

THE DATA GIVES A VERY VERY SLIM CHANCE OF REBUILDING THE STOCK BY 2029 ANYTHING SHORT OF AGGRESSIVE MEASURE IS A SIN AGAINST OUR FISHERY

THE BOARD MUST ADJUST MEASURES TO GET US WHERE WE NEED TO BE BY 2029

---

#### 4.6.2 MANAGEMENT PROGRAM EQUIVALENCY

OPTION B

PLEASE VOTE IN FAVOR OF SUB-OPTION B1A

CE PROGRAMS DO NOT!!!! MAKE SENSE UNTIL THE STOCK LEVELS IS

OPTION C PRECISION STANDARDS

OPTION C

PLEASE VOTE / SUPPORT SUB OPTION C3

Making good decisions requires good data - relying on data with a 30% error rate is NOT acceptable

OPTION D

PLEASE SUPPORT / VOTE SUB OPTION D2

Same comment as above - would you accept compensation for hard work if your boss was allowed to use payment terms that were based on data that had 25% errors

OPTION E

PLEASE SUPPORT SUB-OPTION E2

State-specific level is a must when setting proposed CE programs

Thank you for your hard work and consideration.

The tug is the drug!

Brendan

---

Brendan H. Byrne

BHByrne@GMail.Com

**From:** [Paul Nicoletti](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 (Public Comment)  
**Date:** Friday, April 15, 2022 1:34:23 PM

---

Dear Atlantic Marine States Fisheries Commission,

My name is Paul Nicoletti and I live in the state of Colorado. I was born and raised in Connecticut and spent the majority of my life there. Striped bass were my gateway into fishing as a young adult. I currently work in the marketing department for an internationally known fishing company and my previous job included working for the largest event based fly fishing brand in the US. Although the future of an abundant striped bass fishery affects the future of my career, and those of hundreds of businesses in the fishing industry, my appreciation for the Atlantic striped bass fishery goes far deeper. In addition to working for the state of CT as a fisheries technician in the past, I've spent my entire adult life working to get more youth into fishing and promoting science based conservation awareness.

Below are my choices for Amendment 7 (striped bass management as requested by the ASMFC call for public comment).

4.1

Tier 1

Support A1

Support B1

Support C1

Tier 2

Support A2

Support B1

Support C1

Tier 3

Support A2

Support B2

Tier 4

Support A

4.2

None



Support C1, C2  
Support D2

4.4.1  
Support B

4.4.2  
Support B

4.6.2  
Support B1-a  
Support C3  
Support D2  
Support E2

Thanks for taking the opportunity for public comment seriously. It's a crucial component to the North American Model of conservation and preserving our natural resources in the future. I was 12 years old when I decided I wanted to work in the fish world for my entire life. I believe in the system, and the process.

I hope my voice is heard.

Sincerely,  
Paul Nicoletti  
Boulder, Colorado  
[Paul.nicoletti14@gmail.com](mailto:Paul.nicoletti14@gmail.com)

--

**Paul Nicoletti**  
**(203)-313-7108**  
[paul.nicoletti14@gmail.com](mailto:paul.nicoletti14@gmail.com)

**From:** [James Goodhart](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 1:33:13 PM

---

Good day,

I find it to be very unfortunate that it is necessary to write you with my concerns regarding the overfished striped bass stock. With the tremendous management success regarding the striped bass recovery of the 1990's and early 2000's, I find it depressing that management, following that success, has once again put this iconic stock in jeopardy. Certainly, one of the culprits in this management failure has been the response to the management triggers regarding the spawning female biomass. It seems that all of the hardwork of bringing the striped bass stock back to health gets erased the minute the stock reaches the present management trigger designations. We need to consistently protect the female spawning biomass even after a healthy female spawning biomass has been achieved. In my view, too liberal harvest limits that were unleashed after the threshold target was hit, in 2008, are largely responsible for the presently overfished stock. We had a fantastic fishery in 2008 and by 2011 it was pretty obvious that the stock had spiraled into a stressed and overfished condition. Action to correct the management errors was then mired in years of inaction while the stock continued to decline. The length of time it took for new policies to be implemented caused further decline in the already stressed spawning biomass. We need to protect the female spawning biomass and the adopted policies need to be consistent coastwide. Conservation equivalency should not be allowed once the fishery has been determined to be overfished!!! It's also imperative that we maintain, or improve upon the prescribed 10 year recovery requirement.

Fishery closures during the spawning season and hot water season in the mid Atlantic make sense, but closures during the relatively short season in New England don't. Charter/fishing guides in New England would be destroyed by further limiting our short striper season.

Please protect the breeding females!!!

Sincerely,

James

Capt. James C. Goodhart  
Shadowcaster Charters  
56 Boardman St.  
Newburyport, MA 01950  
(978) 463-7755  
[www.shadowcastercharters.com](http://www.shadowcastercharters.com)

**From:** [Vincent Simmarano](#)  
**To:** [Comments](#)  
**Subject:** [External] Comment for Amendment 7  
**Date:** Friday, April 15, 2022 1:31:59 PM

---

My name is Vincent P Simmarano and I am a surfcaster from the state of Massachusetts, who has recently regained a passion for fishing and conservation.

Growing up in the 1980's, and being fortunate enough to spend my summers on Cape Cod, I absolutely loved to fish. Unfortunately, we all know how bad the striped bass fishery was during that time period. I would try to fish, but as an 8-12 year old with nobody to really teach me at the time, I was never able to be lucky enough to hook up.

As the years went on, academics, athletics, college, marriage, kids, and my career took over, and over time, my interest in fishing diminished. Thanks to a childhood friend who re-introduced me to the sport back in 2012, it has re-invigorated my passion for surf fishing. I have gotten my two children involved, and I want this fishery to be around for them, and their kids.

We have the knowledge and the technology to protect this fishery for years to come! We have to act accordingly, and we have to do it NOW!

Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2  
Support B

4.6.2  
Support B1-a  
Support C3  
Support D2  
Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,  
Vinny Simmarano PT, MS  
38 Valley Hill Drive  
Worcester, MA 01602  
508-826-1040

**From:** [Bryant Bickford](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass comments  
**Date:** Friday, April 15, 2022 1:30:05 PM

---

As one that has spent about 45 years sport fishing and several years in the commercial fishing industry, I am severely concerned for the future of our waters and specifically our native Striped Bass. I feel and remember the disappearance in the late 70s / early 80s, misbalanced populations and year classes as well as changes in forage, predation and human behavior.

in 2018 the ASMFC declared that "**Striped bass are overfished and overfishing is occurring**" this needs to be rectified and contrary to some opinions, we all need to take some responsibility. Please manage this in a sustainable way that makes sure of the future of this fishery .

[Sent from Yahoo Mail for iPhone](#)

**From:** [kbspicer@gmail.com](mailto:kbspicer@gmail.com)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 1:29:01 PM

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To Whom it may concern,

As an avid boater and saltwater fisherman in the State of Rhode Island it is my opinion and those shared by others that Striped Bass are the peoples' fish. We need to work to preserve that tradition for future generations. We will never know if we over managed, but we will know if we didn't do enough. I would rather err on the side of over management. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Ken Spicer

Wickford, North Kingstown, Rhode Island

Email: [kbspicer@gmail.com](mailto:kbspicer@gmail.com)

802 380-1335

Sent from my iPhone

**From:** [Douglas St. Jean](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 1:26:38 PM

---

My name is Douglas St Jean from Rhode Island and am a member of ri saltwater anglers association,,,,I have been fishing for striped bass for several years and love the challenge of chasing these fish along the shoreline all summer long!!!!!!! I am in favor of conservation of these great fish for future generations to come to have the same experiences I have had....  
Thank you

Douglas St Jean  
761 Tunk Hill rd  
Foster RI 02825

Sent from my Verizon, Samsung Galaxy smartphone

**From:** [Thomas Perkins](#)  
**To:** [Comments](#); [Russell Dize](#); [MICHAEL LUISI](#); [David Sikorski](#); [Del. Dana Stein](#); [MAX APPELMAN](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 1:26:12 PM

---

Dear Atlantic States Marine Fishery Commission,

Thank you for all of your hard work on managing our fisheries. I am writing today about the Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass. As a recreational angler, striped bass play a major role in my yearly fishing plans whether that is in Maine, or on the Chesapeake bay or the Potomac. They also support so many livelihoods through commercial fishing, charter fishing and tackle shops. It is sad to see these fish that we have fought so hard to protect once again being overfished and at such risk.

I fully support the positions put forward by the American Saltwater Guides Association. Specifically I support sub-option B1-a, C3, D2 and E2 to limit the use of Conservation Equivalency as outlined in section 4.6.2 Management Program Equivalency.

Thank you,

Thomas Perkins  
Takoma Park, MD



From: [Kai Srisirikul](#)  
To: [Comments](#)  
Subject: [External] Amendment 7 Comments  
Date: Friday, April 15, 2022 1:22:13 PM

---

My name is Kai Srisirikul and I am an avid boat fisherman from the state of Massachusetts. I love striped bass. They are a beautiful fish that has given me so many memories. I am very concerned about the amount of poaching I witness. I want to be able to share this wonderful fishery with my young children. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:  
Support A1  
Support B1  
Support C1

TIER 2:  
Support A2  
Support B1  
Support C1

TIER 3:  
Support A2  
Support B2

TIER 4:  
Support A

4.2  
None  
Support C1, C2  
Support D2

4.4.1  
Support B

4.4.2  
Support B

4.6.2  
Support B1-a  
Support C3  
Support D2  
Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Kai Srisirikul  
Marion, Massachusetts  
Email: [kaisrisirikul@yahoo.com](mailto:kaisrisirikul@yahoo.com)

--- Kai Srisirikul

**From:** [Hale Fitzgerald](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 1:22:09 PM

---

Dear Commissioners,

I am writing to you regarding Amendment 7, and all it entails. I am an avid Striped Bass fisherman and have seen how good things could be, and I want to see that again. I want this fishery managed for abundance. It is my belief that we, and the ASMFC can see this once again if the proper measurements are taken.

As far as the document goes, here are my stances:

Management Triggers, Tier 1: I support sub option A1

Option B: I support sub option B1

Option C: I support sub option c1

SSB Triggers

Option A: I support sub option A2

Option B : I support sub option B1

Option C: I support sub option C1

Recruitment

Option A: I support sub option A2

Option B: I support sub option B2

Deferred Management

I support Option A

Released Mortality

Option C: I support sub option C1 and sub option C2

Outreach Education

I support sub option D2

Rebuilding Plan 4.4.1

I support Option B

4.4.2

I support option B

C.E.

I support sub option B1a

Option C: I support sub option C3

Option D: I support sub option D2

Option E: I support sub option E2

So there it is, Amendment 7 broken down and what I want to see the board do. I appreciate the efforts of this extremely large and complex document by all of those involved. I will once again ask you to do what is best for the fishery. I want to be able to enjoy this resource for decades to come.

Respectfully,

Hale Fitzgerald

**From:** [Timothy Wadman](#)  
**To:** [Comments](#)  
**Subject:** [External] Comment on Amendment 7  
**Date:** Friday, April 15, 2022 1:13:33 PM

---

Dear ASMFC,

My name is Tim Wadman and I am a recreational fisherman from the state of Massachusetts, fishing primarily for striped bass in the waters of Cape Cod. Striped bass are important to me because of the incredible amount of joy I've experienced from inshore fishing over the course of my life. The health and longevity of the species should be prioritized so that anglers throughout the geographic span of the fishery can partake in the unique, rewarding experience of striped bass fishing for decades to come.

Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Tim Wadman

Falmouth, MA

**From:** [Steven Gewirz](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 1:12:14 PM

---

To whom it may concern,

My name is Steven Gewirz and I am from Washington, DC. Being from Washington I have access to the spawning grounds of the Potomac River where I spend a lot of time walking by the river and, in the Spring, fishing for shad. It is one of the wonders of nature that all those Striped Bass run through the heart of our Nations Capital, a large urban center, in order to reproduce and add generations to their numbers only to have them decimated by poor management after they spawn. I also spend a lot of time fishing in New England. I travel to fish and spend a significant amount of money on tackle, boats, lodging, guides and food for the sole purpose of catching Striped Bass and letting them go. I have noticed the decline in numbers and size of the fish caught over the last few years. I fear we will have to return to the moratoriums from my younger days. It seems like an unnecessary and draconian circle to go from stock rebuilding to moratoriums that could easily be avoided with proper management. Because of this, I support the following to amendment 7:

TIER 1:  
Support A1  
Support B1  
Support C1  
TIER 2:  
Support A2  
Support B1  
Support C1  
TIER 3:  
Support A2  
Support B2  
TIER 4:  
Support A4.2  
None  
Support C1, C2  
Support D24.4.1  
Support B4.4.2  
Support B4.6.2  
Support B1-a  
Support C3  
Support D2  
Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,  
Steven Gewirz

**From:** [Shawn O'Neill](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7 Input - CCA  
**Date:** Friday, April 15, 2022 1:11:11 PM

---

We need to manage this fishery unlike we have in the past, it's not working. I recommend going to a 100% catch and release. Eliminate the trophy season stop killing our breeder fish.

**From:** [geoff@civcon.com](mailto:geoff@civcon.com)  
**To:** [Comments](#)  
**Subject:** [External] DRAFT AMENDMENT 7  
**Date:** Friday, April 15, 2022 1:09:01 PM

---

It is my opinion that this amendment should be passed to maintain and expand the Striped Bass in New England.

This recreational fishery is too important to the northeast economy to not protect.

Geoffrey R. Aleva

**From:** [Dylan Lynch](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 (Striped Bass Management)  
**Date:** Friday, April 15, 2022 1:08:03 PM

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Dear Sir or Ma'am -

My name is Dylan D. Lynch, I was born and raised in Pawtucket, and I'm an avid supporter of Rhode Island's proud history of making the coast accessible and enjoyable for everyone, including from one generation to the next. Rhode Island is a state built and sustained by hard working men and women, and striped bass are the peoples' fish. It would be a tremendous sin - one for which we would have no acceptable answer - if we did not preserve that proud tradition for future generations. I want to be able to take my kids and grandkids fishing for striped bass, I don't want to be left with nothing but stories about better days.

We may never know if we over-managed here, as sometimes when you do your job right no one will be certain you did anything at all. But we will know if we failed to do enough, and there will be no going back to right the wrong. Let's err on the side of preservation - we owe it to this State's history and its future.

Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment:

- 4.1
- TIER 1:
  - Support A1
  - Support B1
  - Support C1
- TIER 2:
  - Support A2
  - Support B1
  - Support C1
- TIER 3:
  - Support A2
  - Support B2
- TIER 4:
  - Support A
- 4.2
  - None
  - Support C1, C2
  - Support D2
- 4.4.1
  - Support B
- 4.4.2
  - Support B
- 4.6.2
  - Support B1-a
  - Support C3
  - Support D2
  - Support E2



Thank you for the opportunity to comment on this important issue, and for taking the time to hear me out.

All the Best,

Dylan D. Lynch  
Native of Pawtucket, Rhode Island

**From:** [Brian Mulderrig](#)  
**To:** [Comments](#); [James Gilmore](#); [Emerson Hasbrouck](#); [Sen. TODD KAMINSKY](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 1:07:59 PM

---

Hello team,

I have been fishing for striped bass for as long as I can remember. The species is as much a part of me as it is my family, having grown up chasing them on spinning tackle and flies with my dad, brother, uncles and cousins. Speaking as a new father of a 6 month old son, it is imperative that proper measures are taken to rebuild this species now so fathers like me can share the same experience our fathers did with their children, teaching them valuable lessons in environmental protection , sustainability, preservation, and responsible fishing.

I attended a seminar hosted by the ASGA at the six Harbor's Brewery in my hometown of Huntington, NY a few weeks back and agree entirely with their and the ASA's position on Amendment 7. We need to make sure this species is never overfished again as it has been in the past, and must act now to begin rebuilding their numbers ASAP. Please take the ASA's proposition seriously. The striped bass species is as important to our culture, ecosystem and local businesses. Let's take action and preserve the Atlantic striped bass.

Thank you,  
Brian

Brian Mulderrig  
SVP, Sales  
M: [631.513.2999](tel:631.513.2999)  
W: [www.viralgains.com](http://www.viralgains.com)

**From:** [Bruce Mayer](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 1:06:30 PM

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Dear ASMFC,

My name is Bruce Mayer and I live in Tolland, CT. I regularly fish for stripers from boat and the surf, mostly from the south shore of Rhode Island. I support local charter captains, bait and tackle shops, and marinas. Over the past 20 years, however, I have seen a significant decline in the number and quality of stripers at their traditional spots. I very much hope that your decisions will take into account the value of recreational striped bass fishing, both for the local economy and for the quality of life of residents. With your help, my kids and grandkids will be able to experience the joy of catching this amazing gamefish. It would be a tragedy to throw this away for so many, just to satisfy the special interest of a few.

Below are my choices for Amendment 7 (striped bass management):

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Bruce Mayer

Tolland, CT

Email: [bmayeruchc@gmail.com](mailto:bmayeruchc@gmail.com)

**From:** [Bryan G](#)  
**To:** [Comments](#)  
**Subject:** [External] Comment for Amendment 7  
**Date:** Friday, April 15, 2022 1:03:19 PM

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My name is Bryan Gabel and I am an avid surfcaster from the state of Pennsylvania. Striper fishing is not as much the end result of catching the fish as it is the journey it presents. You testing yourself against the elements, tides, wind, water, and darkness. The lessons of life that it teaches us are about prevalence and preparation. The bond that is created with family, friends, and total strangers that come from all walks of life, on the same quest, a quest that strips everything away in life, it just you on that rock, in the middle of the night, waves rolling in, wind in your face, sand in your eyes, hands numb, cold water down you back and the rod bent over with you tied to a beast pulling you towards the abyss, in your head, did I tie that last not correct. And I say NO, it's not about catching the fish, no sir, that is life in its purest form, and that is the addiction. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

**From:** [John Yemma](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment Seven Public Comment -- Striped Bass  
**Date:** Friday, April 15, 2022 12:57:43 PM

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To the ASMFC:

This is John Yemma from Winthrop Massachusetts, by way of Ipswich Massachusetts. I am responding to the request for public comment on Amendment Seven for the management of Striped Bass.

Below are my choices for each proposed regulation:

4.1  
Tier 1  
A1  
B1  
C1  
Tier 2  
A2  
B1  
C1  
Tier 3  
A2  
B2  
Tier 4  
A  
4.2  
B- None  
C1, C2  
D2  
4.4.1  
B  
4.4.2  
B  
4.6.2  
B1-a  
C3  
D2  
E2

I have been fishing for Striped Bass for over 20 years. The science and anecdotal evidence point to the species being overfished and that aligns with my personal experience.

I acknowledge that this isn't just a problem with the commercial fishing industry, and recreational fishermen have played a role in the problems we see today. I consider myself a part of for movement for the education and advocacy of practicing catch and release (which I have for many years at all times), adherence to the latest proper catch and release techniques, and making a commitment to pass along what we have learned about the status of the fishery and what we can do from the recreational side to take our part to make it right. But we have to

end commercial overfishing of the species, we have the tools to make an impact with that now. In addition to my specific responses written above I feel I must emphasize the need to end conservation equivalency.

But that alone is not enough, and we must act now. Managing for abundance is not only conducive to the best end result for the species, but also the best economic outcome for our fishery and its constituency as a whole. The Striped Bass is the prize sportfish of the Northeast. Our recreational sport fishing industry and all associated industries that support it would face extreme challenges just to stay in business without a healthy striper fishery.

We need to stand up for the striped bass and end overfishing as quickly as possible. Please manage stripers for abundance, and not yield! We all owe it to the Striped Bass species to do everything we can to help the fishery recover.

Thank you,  
John Yemma

--

John Yemma  
[j.yemma42@gmail.com](mailto:j.yemma42@gmail.com)  
508.843.0085 mobile

**From:** [Dan Dunkers](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7 Input - CCA  
**Date:** Friday, April 15, 2022 12:57:27 PM

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Hi,

Have you ever seen the fleet of boats during early summer pounding fish that have been gathered in one area? 200 boats at a time, all chumming with usually 1/2 of them being big charter fleets... the issue here is that those fleets run 2 trips per day, often times with 10-20 people on board all keeping the charter max 2 fish/person whereas the Rec angler only gets 1....so I typically will take a friend and so I get my 2 fish vs. each charter taking 40-80 fish per day... 100 charters doing this all season and you get the problem. If you think I am exaggerating, pls check out Tocherman,s in early June!!!!

IT IS NOT THE REC angler!!!!

I get the charter fleet has to make a living, but how much is enough????? Tighten up the limits on the charter's please... if not, they will loose their business anyway!!!

Stop the commercial menhaden harvest in the bay and by doing both items I mention here, you will see a huge rebound in the fish stock. It is that easy!

Dan Dunkers

Sent from my iPhone

**From:** [Chris Chan](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [Dan Mckiernan](#); [Raymond Kane](#); [Sarah.Peake@mahouse.gov](mailto:Sarah.Peake@mahouse.gov); [Michael Armstrong](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 12:55:45 PM

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Dear ASMFC,

I have lived in the Boston area and been fishing for striped bass as a recreational angler for over 35 years. At first I fished around Boston and then up on the north shore. We currently own a house in Westport MA with a mooring and I fish from a center console boat from upper Buzzards Bay to Newport. RI. I am a fly rod catch and release angler and I tag stripers for the American Littoral Society. In my many years I have seen the striped bass stock rebound because of good management practices and the sport of saltwater fly fishing blossom. Now I see the number of stripers especially big ones plummet because of a variety of factors including poor management. The value of a healthy striped bass population cannot be overstated for me, my fellow anglers as well as the state of Massachusetts. I am very concerned by the many poor spawning year classes in recent years and the decline in the diversity of striped bass sizes we are seeing. Please listen to the urging of all the anglers up and down the Atlantic coast that need the ASMFC to manage striped bass so they are plentiful again. Lots of stripers benefits everyone. Thank you for noting and considering my positions below on the many items being discussed in Draft Amendment 7.

Sincerely,  
Chris Chan

127A Pettey Lane, Westport, MA  
16 Haskell St, Cambridge, MA

**Christopher Chan**  
AIA  
LEED AP  
Home Energy Rating System Associate

**CHAN MOCK ARCHITECTS**  
165 Amory Street  
Cambridge, MA 02139

[cchan@chanmockarchitects.com](mailto:cchan@chanmockarchitects.com)  
T 617 576 2508 F 617 547 8699  
[chanmockarchitects.com](http://chanmockarchitects.com)  
Follow us on [LinkedIn](#) and [facebook](#)

## 4.1 Management Triggers

### Tier 1: Fishing Mortality (F) Triggers

#### Option A: Timeline to Reduce F to the Target

***I support Sub-option A1:*** Reduce F to a level that is at or below the target within one year.

#### Option B: F Threshold Triggers



***I support Sub-option B1:*** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

**Option C: F Target Triggers**

***I support Sub-option C1:*** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

## Tier 2: Spawning Stock Biomass (SSB) Triggers

**Option A: Deadline to Implement a Rebuilding Plan**

***I support Sub-option A2:*** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

**Option B: SSB Threshold Trigger**

***I support Sub-option B1:*** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

**Option C: SSB Target Trigger**

***I support Sub-option C1:*** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

## Tier 3: Recruitment Triggers

**Option A: Recruitment Trigger Definition**

***I support Sub-option A2:*** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

**Option B: Management Response to Recruitment Trigger**

***I support Sub-option B2.*** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

## Tier 4: Deferred Management Action

***I support Option A: No Deferred Management Action.***

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

## 4.2.2 Measures to Address Recreational Release

### Mortality

**Option C. Additional Gear Restrictions**

***I support Sub-option C1:*** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

***I support Sub-option C2:*** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

#### **Option D. Outreach and Education**

***I support Sub-option D2:*** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

## **4.4 Rebuilding Plan**

### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

***I support Option B:*** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

### **4.4.2 Rebuilding Plan Framework**

***I support Option B:*** 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 recruitment assumption specified in Amendment 7) 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.

## **4.6.2 Management Program Equivalency (Conservation Equivalency)**

### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

***I support Sub-option B1-a:*** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

***I support Sub-option C3:*** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

***I support Sub-option D2:*** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

### **Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

***I support Sub-option E2:*** the percent reduction/liberalization projected for the FMP standard at the state-specific level.

**From:** [Joey Solomon](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7 Comments  
**Date:** Friday, April 15, 2022 12:55:44 PM

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Dear ASMFC,

My name is Joey Solomon and I currently live in Massachusetts, though I am also a frequent visitor to the waters of New York. Recreational striped bass fishing has been important to me since I caught my very first striper as a kid while fishing for snapper on Long Island. Since then, I've spent countless hours and dollars chasing stripped bass with my Dad, uncles, and now my own children. My years are structured around the arrival of the fish in the spring and their departure in the fall, and my days in between are planned around the rise and fall of the sun and the tide. I rarely keep fish, though I do maybe once or twice a year. The pursuit is most important, and pursuit is not enjoyable without a realistic chance of success. As stocks dwindle, so do the odds of success. I wish to continue to pursue striped bass with my family into the future. Accordingly, below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

#### 4.1

##### TIER 1:

Support A1

Support B1

Support C1

##### TIER 2:

Support A2

Support B1

Support C1

##### TIER 3:

Support A2

Support B2

##### TIER 4:

Support A

#### 4.2.2

Support B2-b

Support C1, C2

Support D2

#### 4.4.1

Support B

#### 4.4.2

Support B

#### 4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Joey D. Solomon

Ipswich, MA

[jdsolomon@gmail.com](mailto:jdsolomon@gmail.com)

**From:** [Matthew Mckay](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 12:54:08 PM

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I feel strongly that striped bass fishing should be closed to any and all commercial fishing.  
Matt McKay

Sent from my iPhone

From: [Robert Wengrzynek](#)  
To: [Comments](#)  
Subject: [External] Draft Amendment 7 Striped Bass  
Date: Friday, April 15, 2022 12:49:37 PM

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ALL Striped Bass regulations MUST take into account the adverse effects on the Threatened or Endangered species like the Atlantic Salmon in MAINE rivers and estuaries! THERE MUST BE A VALID population based, ACCOUNTING OF THE CHANGES IN STRIPED BASS HARVEST REGULATION ON THE ENDANGERED ATLANTIC SALMON!

There must be an increase in river and estuary harvest of striped bass in MAINE to help restore the Atlantic Salmon!! All states should no have the same harvest regulations!







**From:** [Scott Doty](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 12:49:32 PM  
**Attachments:** [image001.png](#)

---

Dear ASMFC,

I am writing to comment on draft amendment 7 and the options therein, but first I would like to make an overall statement. I am part of the fishing tackle manufacturing industry and am a lifelong catch and release angler. I have fished for striped bass from NC to Maine. The striped bass fishery has fallen into neglect as we have seen fish stocks decimated by environmental catastrophe, forage fish depletion, and overfishing. It is the ASMFC's duty to consider the fishery and then the angler. If drastic measures must be taken, I urge the board to take those measures. Specifically, I am interested in the following options:

#### **4.1**

##### **I support:**

Tier 1

Option A: Timeline to Reduce F to the Target: Sub-Option A1

I would like for the board to move quickly and with the shortest framework to act.

Option B: F Threshold Triggers: Sub-Option B1

Follows the speedier framework of option A1.

Option C: F Target Triggers Sub-Option C1

Again, I support this because it triggers in the least amount of time.

Tier 2

Option A: Deadline to Implement a Rebuilding Plan– Sub-Option A2

Again, the speediest timeline.

Option B: SSB Threshold Trigger Sub-Option B1

If female striped bass are in trouble, so is the entire recruitment.

Option C: SSB Target Trigger Sub-Option C1

Shortest Time frame to act.

Tier 3

Option A: Recruitment Trigger Definition Sub-Option A3

I support a more sensitive trigger definition.

Option B: Management Response to Recruitment Trigger Sub-Option B2

Quick adjustment for tripping fish mortality triggers.

Tier 4

Option A

No deferments please. Kicking the can down the road helps nothing.

#### **4.2**

Option B Effort Controls (seasonal closures)

Sub-Option B2-b.

I support no-target spawning closures. Let's leave these spawners alone when they are trying to reproduce.

Option C. Additional Gear Restrictions



Sub-Option C1 or C2

Especially if these fish are going to be released, we should give them every opportunity to swim away as healthy as possible.

Option D. Outreach and Education

Sub-Option D1

States should absolutely use license money to educate anglers on best catch and release practices.

#### **4.4.1 and 4.4.2**

Option B for both

Rebuild Female SSB by no later than 2029 and giving the board the ability to adjust to meet the requirements is vital.

#### **4.6.2**

Option B-Sub-option B1-a

Option C-Sub-option C3

Option D-Sub-option D2

Option E-Sub-option E2

If we can't do away with CE, let's limit the effect they can have on the management process.

Thank you for your time.

Scott

#### **Scott Doty**

Director of Sales | North Point Brands

410.939.1185

[cheekyfishing.com](http://cheekyfishing.com) | [wingooutdoors.com](http://wingooutdoors.com)



**From:** [daniel.kanoa.fry](mailto:daniel.kanoa.fry)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Friday, April 15, 2022 12:48:01 PM

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To the ASMFC

My name is Daniel Fry and I am a recreational angler in New York and I am taking the opportunity to respond to the request for public comments on Amendment Seven for the management of striped bass.

Here are my choices for each proposed regulation.

4.1

Tier 1

A1

B1

C1

Tier 2

A2

B1

C1

Tier 3

A2

B2

Tier 4

A

4.2

B- None

C1, C2

D2

4.4.1

B

4.4.2

B

4.6.2

B1-a

C3

D2

E2

For reference, I keep a detailed log of my fishing outings and last year I had 122 trips in pursuit of Striped Bass, 119 with a fly rod and 3 trips surf casting. Two of my fly rod outings were guided trips with boat captains on the east end of long island. Thus, the vast majority of my fishing for Striped Bass was fishing from shore and from stand-up paddleboard. I personally contributed crevenues to the fishing equipment / supply, and apparel industry and coastal economies (hotels, restaurants) as well.

I have seen the decline of the Striped Bass fishery up close and personal and urge you to take these actions to preserve the fishery for generations to come, particularly with respect to keeping the baseline targets.

For what it's worth, I think states should require anglers watch a video and pass a short quiz on release methods, in order to get their recreational marine registry / licenses. In addition to managing removals I feel the fishery needs our help to improve recruitment and notably to destroy consumer demand for the fish meat commodity, and I'll personally be taking action and donating funds in that regard as well.

Please stand up for the striped bass, and end overfishing as quickly as possible!!  
Please manage stripers for abundance, and not yield!

Thank You,

Daniel Fry  
Rye, NY

**From:** [Steve Musso](#)  
**To:** [James Gilmore](#); [Emerson Hasbrouck](#); [Sen. TODD KAMINSKY](#); [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 12:45:38 PM

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Dear James J Gilmore, Jr. and Atlantic Striped Bass Management Board:

I am the owner of Super Strike Lures a fishing lure manufacturer in Deer Park, NY. As a lure manufacturer who has been in business since 1975 we have seen our share of ups and downs with the population of Striped Bass. This amazing species we share needs your help.

A healthy striped bass population is vital to the survival of our business as well as all the tackle shops we supply along the east coast.

Being around long to have fished through the last decline I also noticed the subsequent rebound brought by effective management. It was beautiful to the rise due to fisheries management. I believe the current decline is in it's present state because managers have yielded to political pressures by ignoring science and their own management triggers instead of looking our for the best interest of rebuilding fish stocks. The striped bass recovery from the last moratorium demonstrates if we take care of the fish the fish will take care of us. ASMFC needs to look into themselves and learn from the past.

As a small business owner reliant on a healthy striped bass population, I can't see past the shameful and unchecked use of conservation equivalence by ASMFC. These proposals and resulting impacts rarely seem to be on target. The lack of recovery by now if not for some shakey CE claims. Now we are being forced to double down on the 2015 year class. A risky plan at best.

Please be aware there is considerable and growing public distrust in the ability of ASMFC to deliver on their mission of "Leaving healthy and abundant marine fisheries for the next generation to enjoy" There needs to be an improvement in regulations before the fishery is wiped out again.

I support the following options:

4.1

Tier 1

Option A- Support A1

Option B- Support B1

Option C- Support C1

Tier 2

Option A- Support A2

Option B- Support B1

Option C- Support C1

Tier 3

Option A- Support A2

Option B- Support B2

Tier 4

Support A

4.2

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D2

4.4.1

Support B

4.6.2

Option B- Support B1-a

Option C- Support C3

Option D- Support D2

Option E- Support E2

I appreciate the chance to provide comments.

Sincerely,

Steve Musso

Super Strike Lures, Inc.

**From:** [Sean McDermott](#)  
**To:** [Comments](#)  
**Cc:** [Michael Armstrong](#); [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [Dan Mckiernan](#); [Rep. Sarah K. Peake](#); [Raymond Kane](#); [LOWELL WHITNEY](#)  
**Subject:** [External] Striped Bass Amendment 7 Comments  
**Date:** Friday, April 15, 2022 12:44:37 PM

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To the members of the Striped Bass Board,

Thank you for taking the time to read my comments on Draft Amendment 7. I have been an avid fisherman for the last 23 years targeting striped bass all over the Northeast Region. I currently live in Harwich, MA but have also lived in Rhode Island and central Massachusetts. As a trailer boater, I have targeted striped bass from Montauk, NY to Cape Cod seasonally and followed their spring and fall migrations. What I have experienced over the last 8-10 years is a significant decline in the availability of striped bass. Prior to the decline, it was common to have multiple size classes spread out across the region. Now, we generally see single size classes grouped in concentrated geographic areas that gives anglers the impression that fishing is better than it is, especially because of the presence of social media. I don't think the population can survive under the increased pressure they are under. I urge you to strongly consider taking an approach that favors the fish over any other interest when deciding on which options to choose under the proposed amendment.

I support the following options from Draft Amendment 7:

#### 4.1 Management Triggers

##### TIER 1 OPTIONS: Fishing Mortality (F) Triggers

###### – Option A: Timeline to Reduce F to the Target

I support Sub-option A1 (status quo): Reduce F to a level that is at or below the target within one year. The board needs to move as quickly as possible to get below the target, at all costs.

###### –Option B: F Threshold Triggers

I support Sub-option B1 (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

###### –Option C: F Target Triggers

I support Sub-option C1 (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

##### TIER 2 OPTIONS: Female Spawning Stock Biomass (SSB) Management Triggers

###### –Option A: Deadline to Implement a Rebuilding Plan

I support Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is

tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment.

–Option B: SSB Threshold Trigger

I support Sub-option B1 (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

–Option C: SSB Target Trigger

I support Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

TIER 3 OPTIONS: Recruitment Triggers

–Option A: Recruitment Trigger Definition

I support Sub-option A3: The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model (NY, NJ, MD, VA) shows an index value that is below the median of all values in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years. The high recruitment reference period used for this trigger may be adjusted as recommended by the TC during benchmark stock assessments. This trigger alternative has a higher sensitivity than both the status quo trigger and sub-option A2 (Figure 1). This trigger alternative would have tripped six times since 2003: NY in 2006; MD in 2008; MD in 2009; MD and VA in 2010; NY in 2013; MD in 2014 (Table 2).

–Option B: Management Response to Recruitment Trigger

I support Sub-option B2. If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

TIER 4 OPTIONS: Deferred Management Action

I support Option A (status quo): No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

## 4.2 Recreational Fishery Management Measures

### Option B. Effort Controls (Seasonal Closures)

I support Sub-option B2. Spawning Area Closures: The Board can select either or both of the following sub-options B2-a and B2-b. Multiple states currently have spawning closures in place with closure boundaries defined by those states. Existing spawning closures would be applied toward meeting the requirements of the selected option(s).<sup>15</sup> Spawning area closures during the spawning season could contribute to stock rebuilding by eliminating harvest and/or reducing releases of spawning and pre-spawn fish. Reducing releases during this time is particularly important to reduce stress and injury to fish as they move into lower salinity spawning areas. If new information on the timing of striped bass spawning is available in the future, the TC would conduct a review of that

research and recommend changes to the timing of spawning closures if needed. If this option is selected, CE would not be permitted.

I support Sub-option B2-b. No-Targeting Spawning Closure Required: All recreational targeting of striped bass would be prohibited for a minimum two-week period on all spawning grounds (not necessarily the entire spawning area) during Wave 2 (March-April) or Wave 3 (May-June), as determined by states to align with peak spawning. States will determine the boundaries of spawning ground closures. Closures prohibiting recreational targeting on spawning grounds have already been implemented in Maine (Kennebec River), New Jersey (Delaware River), and Maryland (Chesapeake Bay) during part of Wave 2 and/or Wave 3 (Figure 4).

#### Option C. Additional Gear Restrictions

I support Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

I support Sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

#### Option D. Outreach and Education

I support Sub-option D1: States would be required to promote best striped bass handling and release practices by developing public education and outreach campaigns. States must provide updates on public education and outreach efforts in annual state compliance reports.

### 4.4 REBUILDING PLAN

#### 4.4.1 Recruitment Assumption for Rebuilding Calculation

I support Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

#### 4.4.2 Rebuilding Plan Framework

I support Option B: 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 recruitment assumption specified in Amendment 7) 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.

### 4.6 ALTERNATIVE STATE MANAGEMENT REGIMES

#### 4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option B. Restrict the Use of Conservation Equivalency Based on Stock Status

I support Sub-option B1-a. Restrictions: CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.



4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals

I support Sub-option C3: CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30.

4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries

I support Sub-option D3: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 50%.

4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries

I support Sub-option E2: Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state-specific level.

I sincerely hope The Board will take action to correct the current decline of the Striped Bass population via Amendment 7. The bass were pushed to the brink in the 80s, and we cannot let that happen again.

Thank you for taking the time to read my comments.

Sean McDermott

**From:** [Peter Morrison](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass  
**Date:** Friday, April 15, 2022 12:42:06 PM

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You know the bass stocks are way down yet we as recreational anglers see no action from the people charged to address the problem. Your document you requested comments on is just way to lengthy and overly complicated for anyone to read it and actually understand what you're various alternatives are.

To say anglers are disappointed is a gigantic understatement to say the least. Why don't you follow the KISS principle and maybe we could all see some meaningful improvement to the striped bass problem.

For example we know what worked back in the moratorium time so why not try that?

Thank you

Pete Morrison  
804 Wesley Road  
Ocean City NJ

Sent from my iPhone

**From:** [John Farrell](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 12:40:41 PM

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I propose that Striped Bass fishing must be done using artificial lures only. The use of circle hooks with either live or cut bait do not adequately protect fish from becoming gut-hooked. Today's artificial lures are extremely effective, economical, and induce mouth-hooked catches far greater than circle hooks.

I catch hundreds of stripers each year and have transitioned from the use of bait to exclusively using lures. Not once have I gut-hooked a striped bass or any other game fish while using artificial lures.

Thank you,

John Farrell

**From:** [glenn@guydist.com](mailto:glenn@guydist.com)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7 Input - CCA  
**Date:** Friday, April 15, 2022 12:36:15 PM

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It seems to me that the large females need to be protected. A 20 to 27 or 28 inch slot limit makes sense during all seasons, with a long closure during the summer. Also we should never use treble hooks with barbs. Not sure about creel limits, maybe allow 2 fish during the late fall?

Thanks  
Glenn Guy  
Leonardtown, Md.  
[glenn@guydist.com](mailto:glenn@guydist.com)

**From:** [themcmanus@gmail.com](mailto:themcmanus@gmail.com)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Friday, April 15, 2022 12:20:18 PM

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To the ASMFC

My name is Brian McManus from NY and I am responding to the request for public comments on Amendment Seven for the management of striped bass.

Here are my choices for each proposed regulation.

4.1  
Tier 1  
A1  
B1  
C1  
Tier 2  
A2  
B1  
C1  
Tier 3  
A2  
B2  
Tier 4  
A  
4.2  
B- None  
C1, C2  
D2  
4.4.1  
B  
4.4.2  
B  
4.6.2  
B1-a  
C3  
D2  
E2

I have fished for striped bass thru out the North East since my teens years, and the Striped bass trips and striped bass fishing has shaped my life. This fish is American as the bald eagle and holds as much significance as the cod fish does. The Striped Bass like the cod became

the currency that fueled economics of the founding of this very country. It still to this day is a significant part that drives the economies that summer/waterfront communities from Virginia all the way to Maine rely on to exist.

Beside the loss of the esthetics of this beautiful and majestic fish, the economic impact that the collapse of this fishery will bring will be as real.

We saved the California Condor, we saved the American Buffalo, we at this moment should draw inspiration from those great efforts. We need to realize this could be the last chance to Save the Striped Bass so let us not squander it. The power resides in the hands of the ASMFC and we ask the ASMFC to make the responsible decisions that leads to the recovery of the Striped Bass fishery.

Sincerely,  
Brian McManus

**From:** [ldefonteny@optonline.net](mailto:ldefonteny@optonline.net)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] draft amendment 7  
**Date:** Friday, April 15, 2022 12:18:32 PM

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Dear Ms.Franke,

Thank you for considering public comments on amendment 7

I'm a 75 year old avid striped bass fisherman who has been through boom and bust years with my favorite fish. I'm also a member of the Berkeley Striper Club (BSC) in Seaside park NJ. and tag fish for the club.

My concern is the amount of spawning bass being currently killed in the Raritan bay and Hudson river. These are being beat upon daily. Charter and party boats are taking daily limits of fish, then after boxing their catch they continue catch and release thereby killing more, some several times a day.

Catch and release guys are also killing 9 out of 100 bass.

Trophy pictures of big egg laden females hanging from a boga grip don't help the situation either.

Ms. Franke, I urge you to consider Passing 4.2 b-2 No targeting bass during the spawn in staging or spawning areas. We cannot bring the bass back to abundance by killing the spawners.

Thank you,

Lou de Fonteny

380 Roberts ave.

S. Seaside park, NJ 08752

**From:** [Joseph DAgostino](#)  
**To:** [Comments](#)  
**Subject:** [External] Joebaggs Outdoors  
**Date:** Friday, April 15, 2022 12:15:59 PM

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Joseph D'Agostino owner of Joebaggs Outdoors,

I would like to start with how stripers are the emphispecies here in the northeast and that local shops, manufactures, and anglers depend on the existence of our striped bass. Speaking for Joebaggs Outdoors, Striped bass account for 64% of all sales in 2021 and for the last 11 years that number has only increased. Many local shops and guides understand the importance of growing and maintaining the bio mass of stripers that make their way to the local reefs throughout the season.

Today is much different than 10 years ago, let me explain. Experience and travel have allowed me to witness stripers flourish from 2000-2012 where they flourished on every reef from MA to NY. Today we are seeing some reefs hold fish and many are not. The bait that hold stripers to the reefs are still present. The bass that were once thick and spread out are now thin and heavily concentrated in a few areas. This is what I have seen over the last 8-10 years and it hasn't gotten better.

This is we're we stand, We support the following and encourage that we continue to work with a slot limit shrinking the allotted inches yearly( as needed) and moving them horizontally on the ruler to protect fish classes. We also support the ASGA and the options they support.

**ASGA Supports Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**ASGA Supports Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

**Rationale for Sub-option C:** ASGA supports both C1 and C2 to address recreational release mortality. Sub-option C1 addresses the use of gaffs. Nets have become lighter and stronger over the years. The nylon mesh has been replaced with material that doesn't remove a fish's protective slime. The current slot limit makes the ability to safely release a fish even more critical. Sub-option C2 helps to close a loophole in the circle hook mandate. In the nutshell, this sub-option would require an angler to release a fish that was caught as bycatch and with a J-hook.

#### **Option D. Outreach and Education**

**ASGA: Supports Sub-option D2:** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

**Rationale:** We reached out to several of the ASMFC commissioners and asked their feedback on



this issue. Everyone responded that their state was willing and able to meet the needs of this option. ASGA therefore supports D2.

#### **4.4 Rebuilding Plan**

We are in a very bad position with the striped bass stock. When the latest stock assessment was accepted in 2019, we curbed the F rate through Addendum VI. We did not address rebuilding. That means we have less time to get the job done. The poor recruitment in the Chesapeake is making this situation far worse. We don't have good year classes to rely upon.

If you go back in time to 2012, many concerned anglers were ringing the alarm bells about the stock. We knew from the numbers that striped bass SSB would be overfished by 2017. But the numbers for the 2011 year-class showed it was the fourth-best on record. Rather than take a greater-than-30% reduction in harvest, we bet on the 2011 year-class. The Chesapeake, meanwhile, only took a 20.5% reduction. The 2011s were going to save the day. Unfortunately, Maryland decimated the 2011s and the cohort did not recruit to the coastal migratory stock in the numbers we all wanted.

Fast forward to today and it is 2022, three years after a rebuilding plan should have been in place, and we are watching a stock in freefall with no year classes to replace them. What does rebuilding look like now?

In October 2022, we will finally get an update to the 2018 stock assessment. How will we handle this situation? Below is a glimpse into that question. The bottom line is that once again, the inaction of the Striped Bass Management Board has put us in a terrible position. This stock is not being managed for what it is and that is the core of the problem. Striped bass are an economic engine for the entire Atlantic coast. That engine drives an economy that is based on abundance. Tackle shops, restaurants, hotels, and small-scale manufacturers have been crushed by the pandemic and subsequent supply chain and employment issues. Now, we don't have fish for anglers to catch. This is shaping up to be a disaster for striped bass and the economy they support. We can trace it all back to a few terrible decisions by ASMFC.

##### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

**ASGA Supports Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

**Rationale:** There are two options for rebuilding. One is rebuilding under a normal regime. The other option, B, is called a "low recruitment regime." Option B accounts better for what we are facing. The last three years of recruitment in Maryland's portion of Chesapeake Bay are the worst since 1979-1981.

We should be honest about the situation with striped bass. If we want to rebuild the stock, we must recognize that this needs to be done under a low recruitment assumption. Therefore, ASGA supports Option B.

##### **4.4.2 Rebuilding Plan Framework**

**ASGA Supports Option B:** 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 recruitment assumption specified in Amendment 7) 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.

**Rationale:** What exactly does Option B mean and why do we support it? The update to the stock assessment will come out in October 2022. This information may dramatically change everything we have done through Amendment 7. Option B directs the Board to address these potential needed changes to rebuilding as quickly as possible if the assessment shows that we need to do more. Rather than continue with more delays, we will have the ability to adjust removals before the 2023 season. Without this option, we would lose another year and be backed further into a rebuilding corner. None of this would be necessary if the Board had acted in 2018. But, here we are again.

An additional year could make a lot of difference in the pain we all will face through rebuilding. The only downside to this option is that public comment is limited since time is of the essence. We will still be able to comment in some capacity, but it would be limited.

While we don't like this situation, we appreciate the motion and its addition to Amendment 7.

#### **4.6.2 Management Program Equivalency**

Management Program Equivalency is also known as Conservation Equivalency (CE). We have been screaming from the rooftops for years about the negative aspects of CE. CE allows states to create their own regulations. The CE process has been systematically abused by several states. It has limited the recovery of striped bass. It has led to states not meeting their conservation goals. It is the root cause of large year classes not contributing to the coastal stock in the volume that was expected. It is one of the leading causes of the current troubled state of striped bass.

*If there is one item you decide to comment on, this one should be it.* We must overwhelm the Striped Bass Management Board with our thoughts on CE. This is our chance to put some guardrails on CE and end the abuse of this management tool.

#### **Option B. Restrict the Use of Conservation Equivalency Based on Stock Status**

**Supports Sub-option B1-a:** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

**Rationale:** CE adds risk to fisheries management. Should we really be assuming that risk if the stock is below the management threshold? We don't think so. This is a simple option that rings true with us.

Flexibility in striped bass management might as well be a four-letter word. We don't need more flexibility. We need to manage this fishery for abundance. There will most likely be a lot of opposition to this option. It is critical that the Board hears your voice.

#### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

**Supports Sub-option C3:** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

**Rationale:** 30% is the precision standard for MRIP estimates that NOAA Fisheries considers reliable. This option would agree with current federal guidance. C1 and C2 would allow for the use of MRIP estimates with up to 50% and 40% PSEs, respectively. We believe those levels bring extra risk to the process. Furthermore, states ultimately control the PSE associated with the fishery. For instance, a state can lower the PSE by increasing state-run surveys and dockside intercepts. The result of sub-option C3 will be a lower risk as well as improved recreational fishing data. That creates a win-win for fishermen as well as the resource.

**Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

**ASGA Supports Sub-option D2:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

**Rationale:** What is an Uncertainty Buffer? If a state decides to use CE, there is a level of uncertainty that should be factored into management. As an example, if states are required to lower harvest by 100 fish, a state that uses CE would have to come up with a plan that would curtail harvest by 25% more, or 125 fish. We have used the term “luxury tax” to describe this. The fact that this option is in Amendment 7 is validating. If CE wasn’t a problem, we would not see this in Amendment 7. It will make states think about using CE because it will cost them more on the front end. We originally advocated for accountability on the back end. If a state exceeded harvest, they would have to pay for it the next year. In some ways this is better because it will make them stop and think before they submit their plans.

Sub-options D1 and D3 would establish buffers of 10% and 50%, respectively, while D2 sits in the middle at a 25% buffer. If you look at the performance of some states that use CE, the 25% number because more justifiable.

**Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

**ASGA Supports Sub-option E2:** the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Thank you,

From: [Capt. Brian Williams](#)  
To: [Comments](#)  
Subject: [External] Amendment 7  
Date: Friday, April 15, 2022 12:12:40 PM

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My name is Captain Brian Williams. I am a full-time fishing guide as owner operator of Badfish Charters Fishing the waters of Ocean City, NJ. I am strictly catch and release for striped-bass and i have a unique vantage point to the striper fishery and the decline that is still happening today. From one location i have the opportunity to fish not only the Ocean but, 20 plus miles of backbay flats both north and south, and 16miles of river system. On any given day i may cover all of the above depending on the conditions at hand and time of year dictating where the striped bass may be.

We must change how we handle this species. Its a coastwide migratory species and should be managed as one. CE does not work and we need it suspended at the very least until a time when the stock is rebuilt. We need to tie the managerial hands of CE abuser states like my home state of NJ to prevent more damage to this fishery before its too late. And add accountability measures in place to prevent anymore overages from occuring.

Angler education is also very important. Why not have video courses much like the NOAA shark permits before your allowed to target striped bass. We need strong emphasys on proper release tactics as the ignorance witnessed on a quick trip to social media can be very eye opening these days. THIS is how we curb release mortality in an easier to enforce and manage way.

Funding enforcement is a must, Maybe consider some kind of funding allocation for states to allow them to better specifically enforce striped bass problems. As i can tell you in my state this is a huge issue that goes un-corrected and most likely is not reflected or under-reflected in any of the science. A great example of this is during this past falls brief shadow of an ocean run, it was a daily event to see boats "limiting out" then going o the radio to other boats to trade or give them their additional fish they hoooked. Usually on the troll which as we know also hurts us with higher release mortality. I witnessed a guy the one day on the radio as hes fighting the fish saying he was tripled up on troll and already had his limit, asking other boats who wanted to take these fish from him. This CANNOT continue this way.

What is also needed is strong management triggers t remain to assure mistakes of the past donot repeat themselves. Striper wont fix themselves and this is our chance to permanently resolve overfishing issues and create a better more educated atmosphere on the water to assure a future for the striped bass.

Below are my choices for this complex and confusing amendment.

#### 4.1 Mangemant triggers

Tier 1: Mortality triggers

Option A1 SQ

Option B1 SQ

Option C1 SQ

Tier 2: SSB Triggers

Option A2

Option B1 SQ

Option C1

Tier 3: recruitment Triggers

Option A2

Option B2

Tier 4: Deferred Management Plan

Option A SQ

4.2.2 Release mortality

Option C

BOTH C1 and C2

Option D

D2

4.4 Rebuilding

4.1.1 Recruiot Assumtion

Option B

4.4.2 Rebuilding Plan

Option B

4.6.2 Management EQ

Option B. Restrict Use Of CE

B1-a

Option C. Precision standards for MRIP

C3

Option D. CE buffer

D2

Option E. Definition of EQ for CE

E2

Thanks for your time and please rebuild these striper to what we witnessed in the late 90s early 00's

Thanks,  
Capt. Brian Williams

Badfish Fishing Charters

856.371.4346

Bwilliams@ocnjfishing.com

Insta: captbrianwilliams

Fb: Badfish charters oc

[www.OCNJFISHING.com](http://www.OCNJFISHING.com)



**From:** [James Hamilton](#)  
**To:** [Comments](#)  
**Cc:** [Dan Mckiernan](#); [Michael Armstrong](#); [Rep. Sarah K. Peake](#); [Raymond Kane](#); [LOWELL WHITNEY](#)  
**Subject:** [External] Amendment 7 Comment  
**Date:** Friday, April 15, 2022 12:10:37 PM

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> April 15th, 2022  
>  
> Emilie Franke  
> Fishery Management Plan Coordinator  
> Atlantic States Marine Fisheries Commission  
> 1050 North Highland Street, Suite 200A-N  
> Arlington, Virginia 22201  
>  
> Dear Ms. Franke and members of the ASMFC Striped Bass Advisory Council,  
>  
> Passionate striped bass recreational fisherman and Massachusetts resident here chiming in for further protection of striped bass stocks up and down the East Coast. I remember catching big bass when I was a kid, and can only hope to have those days again for myself and my children before it's too late. I believe my comments below reflect that.  
>  
> Thank you  
>  
> James Hamilton  
>  
> Please find my comment on the Striped Bass Draft Amendment 7 below.  
>  
> 4.1 Management Triggers  
> Tier 1  
> - Sub-Option A1  
> - Sub-Option B1  
> - Sub-Option C1  
> Tier 2  
> - Sub-Option A2  
> - Sub-Option B1  
> - Sub-Option C1  
> Tier 3  
> - Sub-Option A2  
> - Sub-Option B2  
> Tier 4  
> -Option A  
> 4.2.2 Measures to Address Recreational Release Mortality  
> Option C  
> - Sub-Option C1  
> - Sub Option C2  
> Option D  
> - Sub Option D2  
> 4.4 Rebuilding Plan  
> 4.4.1 Recruitment Assumption for Rebuilding Calculation  
> Option B  
> 4.4.2 Rebuilding Plan Framework  
> Option B  
> 4.6.2 Management Program Equivalency  
> Option B  
> - Sub-Option B1-a

- > Option C
- > - Sub-Option C3
- > Option D
- > - Sub-Option D2
- > Option E
- > - Sub-Option E2



**From:** [bsaezjr@gmail.com](mailto:bsaezjr@gmail.com)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 12:10:36 PM

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Too many unlicensed poachers along Connecticut River(Bike/walk area) in Springfield,MA(Hampden County) and there's no way to report them

*Sent from my T-Mobile 4G LTE device*

**From:** [Sue Bertoline](#)  
**To:** [Comments](#); [Maureen Davidson](#); [Emerson Hasbrouck](#); [James Gilmore](#); [CAROL HOFFMAN](#); [Sen. TODD KAMINSKY](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 12:07:00 PM

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To all ASMFC members

I am an avid angler and most of my free time is spent on or near the water fishing. I spend a considerable amount of money on this hobby whether on tackle, transportation, etc.

I am completely stunned that 3 years ago the striped bass fishery was deemed to be overfished and overfishing was occurring, yet we are still debating on what measures to take to save the stock. Yes, a quick slot limit was put into to play but it included CE benefits. You and I both know, that is not going to help this fishery. Then you release a 149-page draft document for public comment. Who does that? Did you think you would overwhelm enough people that they wouldn't take the time to comment? I hope many prove you wrong.

Striped bass needs to be managed for abundance. As an angler, I want to be able to catch fish. I would rather catch all day without being able to keep any, then to be able to keep 1 or 2 but not be able to find them since their numbers are declining at a rapid rate. An area that I have fished spring and fall years past, held no fish last year. There have been no other changes in this particular area, so it seems to be due to their overfished status. I have friends who run charter boats, tackle shops, etc. I do not want to see them go out of business due to the fishery collapsing. What about the restaurants, delis, gas docks etc that rely on these businesses to bring in monies to their area from anglers going fishing? Florida seems to understand that fish in the water equals revenue for all types of business as well as the state. If we keep harvesting the stock, there will be nothing left. Recruitment the last few years has been down and now the 2015 class is set to hit the slot limit. Where will we be in a year or 2? I know some say they need to harvest to put food on the table. Really?? That is pretty expensive fish if you are paying for a charter, party boat or even gas and bait to fish the beach. Better off buying it at the fish market.

Shouldn't we leave the fishery in better shape for future generations? I think we should, and I know a lot of others that feel the same way.

I agree and support the stance of the ASGA.

Below please find my options for Amendment 7:

Tier 1: Sub-option A1 Sub-option B1 Sub-option C1	Tier 2: Sub-option A2 Sub-option B1 Sub-option C1	Tier 3: Sub-option A2 Sub-option B2
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Tier 4: Option A (No deferred management plan)
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Measures to address release mortality:

Sub-option C1

Sub-option C2

Sub-option D2

Rebuilding plan:

-Recruitment assumption

Option B

-Framework

Option B

Equivalency: **OVERFISHED, NO CE!!**

Sub-option B1-a

Sub-option C3

Sub-option D2

Sub-option E2

Thank you for your time.

Sue Bertoline

New York

**From:** [Michael Cool](#)  
**To:** [Comments; stripercomments@gmail.com](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 12:02:34 PM

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Hi I'm a new charter captain in the Chesapeake Bay. This is my first year running charters but I have been fishing for striped bass for 20 years. I personally notice how the decline of stock is getting worse. I feel there are multiple reasons for this happening and some of which I have not seen addressed. The largest I feel is water quality in the bay. There's no oxygen for the fish to live healthily. The run off chemicals have hurt the bay tremendously. Killing the grasses and enriching algae blooms. Affecting the native fish in the summer worse than the migratory fish. We could combat this with more filter fish like oysters and menhaden. Both of which are being reduced to almost extinction. Please work on reducing the numbers on menhaden quota and oysters as well. Also the state of pa and md need held accountable for the sewage and nitrogen run off and trash being sent to the bay. The other factors are the invasive fish like catfish and snakehead. These fish demolish the small and egg bass before they can grow enough to defend themselves. Please vote to reduce the Breeder fish being harvested reduce limits on head boats and consider catch and release with artificial lures a safe alternative to baitfishing and trolling where fish have greater risk of mortality. I'm short of time but appreciate the work you do thank you.

**From:** [Christopher Sargent](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 12:00:35 PM

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Hello,

Striped Bass have been a very important part of my life, growing up and in my adult life today. These fish were plentiful and brought countless hours of enjoyment when I was on the water. Over the years there have been fewer and fewer fish and while I still enjoy the time on the water, the lack of Striped Bass is a bummer. It would be amazing if over the coming years these fish can live and grow their population for generations to come. Below are my thoughts on some of the different proposals. Thank you for your consideration.

### **Tier 1: Fishing Mortality (F) triggers**

**Support Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year.

### **Tier 2: SSB Triggers**

**Support Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

### **Tier 3: Recruitment Triggers**

**Support Sub-option A2:** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA) shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

### **Tier 4: Deferred Management Action**

**Support Option A (status quo):** No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

#### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

**Support Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

--

Christopher Sargent  
[christopher.t.sargent@gmail.com](mailto:christopher.t.sargent@gmail.com)  
860-819-5076



**From:** [Gianfranco Z](#)  
**To:** [Comments](#)  
**Cc:** [WSBC Westport](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 11:56:25 AM

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Dear Committee,

My name is Gianfranco Zaffina I am a recreational fisherman from Connecticut. I am writing today in regards to amendment 7 and protecting this special resource. I am a long time surfcaster and primarily target Striped Bass from March - December, the fishery is in a stark decline and we need change to protect these fish for years to come. The committee has failed across the board and needs to listen to the actual fisherman seeing real time events and this decline so that way we can move forward and in a positive direction.

I favor the following options for Draft Amendment 7:

Tier 1:

Option A Timeline: Sub-option A1(status quo)

Option B Threshold: Sub-option B1 (status quo)

Option C Target: Sub-option C1 (status quo)

Tier 2:

Option A: Deadline to Implement a Rebuilding:

Sub-option A

Please take my comments into consideration, these fish need help immediately for a successful fishery for years to come. Thank you for the time

Gianfranco Zaffina

**From:** [Nicholas Fox](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7 - Public Comment  
**Date:** Friday, April 15, 2022 11:51:26 AM

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I'm relatively new to recreational angling after ramping up my time on the water during the pandemic. I went from spending a few days on the water a year in 2018 and 2019 to 50+ in both 2020 and 2021. During that time, as I've learned more about conservation principles and the state of our fisheries, it's become clear that striped bass play a critical role in this ecosystem, and that they're in trouble. I believe strong, aggressive action is needed to protect the striped bass stock and promote its abundance so that we can have the luxury of managing this resource in the decades to come.

To be specific, I support management triggers that manage our stocks conservatively, for abundance, and for future generations. Below are where I stand on the sections of Draft Amendment 7:

#### **Section 4.1 - Management Triggers**

On fishing mortality: I would like to see options A1, B1, and C1 implemented, which provides clear aggressive timelines to reduce F while tracking data year over year.

On spawning stock biomass (SSB) triggers: I would like to see Sub-Option A2, Sub-Option B1, and Sub-Option C1 implemented.

On Recruitment Triggers: I'd like to see Sub-Option A2 implemented, and Sub-Option B2 implemented.

On the Deferred Management Plan: I support Option A. NO deferred management action should be permitted, and that the board MUST respond based on assessment updates immediately.

#### **Section 4.22 - Measures to Address Recreational Release Mortality**

On Additional Gear Restrictions: I support Sub-Option C1 and Sub-Option C2

On Outreach and Education: I support Sub-Option D2

#### **Section 4.6.2 - Management Program Equivalency**

On Option B - Restricting the use of conservation equivalency (CE) based on stock status: I support Sub-Option B1.

On Option C - Precision standards for MRIP Estimates for CE Proposals: I support Option C3.



On Option D - CE Uncertainty Buffer for Non-Quota Managed Fisheries: I support Sub-Option D2.

On Option E - Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries: I support Sub-Option E2.

Overall, I hope that the ASMFC makes decisions that manage the striped bass fishery for abundance, even if that means making unpopular choices among recreational or commercial anglers. Given the state of the fishery and the recent data, it's clearly time to take immediate and aggressive action to protect striped bass. The half measures taken so far are NOT enough, clearly. We must put protections in place that allow the remaining stock to grow, spawn, and thrive for years to come. Thank you.

Nick Fox

301-643-9595

**From:** [Carly Audet](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7  
**Date:** Friday, April 15, 2022 11:49:23 AM

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To the ASMFC,

My name is Carly Audet, and I am from Massachusetts. I love catching striped bass, and have been fishing for them for over 10-years. My husband and I have made many fun memories in pursuit of the striper, and we look forward to fishing for them every year on the Cape and in Rhode Island.

I don't think we should be waiting 10 years to rebuild the fishery. We should do it sooner, and this should be the priority, not how many we can keep, or how many can be killed up and down the coast. It seems to me there's too much money in catch and release to even be considering how many we can kill.

Also, while I'm writing, more should be done about poaching. It's a very serious issue, and needs to be addressed.

Here are my picks for Amendment 7.

#### **4.1**

##### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

##### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

##### **Tier 3**

Option A- Support A3

Option B- Support B2

##### **Tier 4**

Support A

#### **4.2**

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D1

#### **4.4.1**

Support B

#### **4.4.2**

Support B

#### **4.6.2**

Option B- Support B1-a

Option C- Support C3  
Option D- Support D3  
Option E- Support E2

Thank you  
Carly Audet

Douglas, MA  
304-906-1971

**From:** [Michael Georgiana](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7 Public Comment  
**Date:** Friday, April 15, 2022 11:49:03 AM  
**Attachments:** [image001.png](#)

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Atlantic States Marine Fisheries Commission,

I'm voicing my support for the below changes to the management of our Striped Bass fishery. It's clear throughout the striper coast that these fish are in trouble for a litany of reasons. We need to take action now. There is anger from all interest groups (commercial, recreational, etc.), we are going to need to make equally significant sacrifices and we need to use reliable and accurate information to choose what sacrifices need to be made. We want accountability for those who are exploiting the fishery in MD and VA. Legal / illegal netting must be addressed.

### **Tier 1 F Target Triggers**

#### **Option A: Timeline to reduce F to the target**

**I support Sub-option A1.** Reduce F to a level that is at or below the target within one year.

-Delaying action will get us nowhere but further from our goal of strengthening this fishery. Reducing the number of fish being removed from the fishery will only benefit the fishery as a whole.

#### **Option B: F Threshold Triggers**

**I support Sub-option B1.** If F exceeds the F threshold the SBMP must be adjusted to reduce F to the desired level within the time frame in option A1.

-Again delaying action will only continue to hurt the fishery.

#### **Option C: F Target Triggers**

**I support Sub-option C1.** If F exceeds the F target for two consecutive years and the spawning female SB fall below the target in either of those years the SBMP must be adjusted to reduce F to a level at or below the threshold within the option A timeframe.

-This stays in line with the previous options and denotes a relation between F and Spawning Female Striped Bass.

## **Tier 2: SSB Triggers**

### **Option A: Implementing Rebuilding Plan**

**I Support Sub-option A2.** The shorter the deadline for implementing a SSB rebuilding plan the better.

-Obviously this must be within reason in order to be realistic and be effective. Implementing a rebuilding plan within 2 years of a trigger seems to do that. Again the sooner the better. **Striped bass were declared overfished in 2018. There has still been no rebuilding plan implemented or established. This is a problem. This option would prevent this happening in the future.**

### **Option B: SSB Threshold Trigger**

**I support Sub-option B1.** The Striped Bass Management Program must be adjusted to rebuild the biomass within an established time frame. If the stock becomes over fished, which many feel it currently is. It needs to be addressed as soon as possible. Cannot exceed 10 years. Much sooner would be preferred and I could argue that sooner is necessary.

### **Option C: SSB Target Trigger**

**I support Sub-option C1.** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years]. **Sooner is better.**

## **Tier 3: Recruitment Triggers**

### **Option A: Recruitment trigger definition**

**I support Sub-option A3.** The trigger needs to be updated immediately. It has not been tripped for the coastal stock which is a major issue. It has been tripped 1 time since 2003 for

NC which is a clear and definitive example of why it must be updated. My **second choice** would be **Option A2**

### **Option B: Management Response to trigger**

**I support Sub-option B2.** We must be responsive to recruitment triggers. We must listen to the science and stop exploiting strong year classes and ignoring the poor ones.

### **Tier 4: Deferred Management Action**

**I support Option A.** There should be **no** deferred management action **without exception.**

### **4.2.2 Addressing Recreational Release Mortality**

**I support Sub-option C1.**

**I support Sub-option C2.** There is **no reliable data to quantify the effects any proposed C&R targeting closures would have.** Especially while leaving the nets in spawning/staging areas.

### **Option D: Outreach and Education**

**I support Sub-option D2.**

### **4.4 Rebuilding Plan:**

We are in a very bad position with the striped bass stock. When the latest stock assessment was accepted in 2019, we curbed the F rate through Addendum VI. We did not address rebuilding. That means we have less time to get the job done. The poor recruitment in the Chesapeake is making this situation far worse. We don't have good year classes to rely upon.

If you go back in time to 2012, many concerned anglers were ringing the alarm bells about the stock. We knew from the numbers that striped bass SSB would be overfished by 2017. But the

numbers for the 2011 year-class showed it was the fourth-best on record. Rather than take a greater-than-30% reduction in harvest, we bet on the 2011 year-class. The Chesapeake, meanwhile, only took a 20.5% reduction. The 2011s were going to save the day. Unfortunately, Maryland decimated the 2011s and the cohort did not recruit to the coastal migratory stock in the numbers we all wanted.

Fast forward to today and it is 2022, three years after a rebuilding plan should have been in place, and we are watching a stock in freefall with no year classes to replace them. What does rebuilding look like now?

#### **4.4.1**

**I support Option B.**

#### **4.4.2**

**I support Option B.**

#### **4.6.2**

**I support Sub-option B1.** Restrict the use of CE

**Option C:**

**I support Sub-option C3.**

**Option D:**

**I support Sub-option D2.**

**Option E:**

**I support Sub-option E2.**

**Brennan C. Thompson**

Financial Advisor, AAMS®

RAYMOND JAMES & ASSOCIATES

[20 Montchanin Road, Suite 280](#)

[Greenville, Delaware](#)

Phone: 302-656-1534

Fax: 302-656-1737



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**From:** [Chris Holland](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 11:48:30 AM

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My name is Christopher R. Holland and I am an avid boat and shore fisherman from the state of Rhode Island. Striped bass are the peoples' fish. We need to work to preserve that tradition for future generations. We will never know if we over managed, but we will know if we didn't do enough. I would rather err on the side of over management. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that our message and voice's will be heard.

Sincerely,

Christopher R. Holland

Middletown, Rhode Island

Email: [chrisholland@saltwateredge.com](mailto:chrisholland@saltwateredge.com)

**From:** [Robin Sleith](#)  
**To:** [Comments](#)  
**Subject:** [External] striped bass amendment 7  
**Date:** Friday, April 15, 2022 11:44:08 AM

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To the commission:

My name is Robin Sleith, I am from midcoast Maine, and I'm an avid surfcaster who has been pursuing striped bass for more than a decade. We need to save this amazing species, and should be worrying less about yield and more about abundance. I also am dismayed to see the timeline being 10 full years to rebuild the stock. This is too long. There is no reason we can't rebuild the stock in less time than that. As a research scientist, I find it frustrating that there are not more statistically robust management measures. I also have been frustrated by how hard it has been to get through the huge 180-page document. Can't there be a shorter version given to the public in the future?

This fishery means so much to me and I want my son to grow up in a world full of striped bass. We need fast, divisive action.

Here are my choices for the proposed regulations.

4.1  
Tier 1  
A1  
B1  
C1  
Tier 2  
A2  
B1  
C1  
Tier 3  
A2  
B2  
Tier 4  
A  
4.2  
B- None  
C1, C2  
D2  
4.4.1  
B  
4.4.2  
B  
4.6.2  
B1-a  
C3  
D2  
E2

Thank you,

Robin Sleith

**From:** [Greg Mcsharry](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment 7 striped Bass  
**Date:** Friday, April 15, 2022 11:42:20 AM

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My name Greg McSharry and I live In Massachusetts. I work in a tackle shop and have been an avid surf casting angler for 25 years. In my time working in the shop and fishing over the years it is clear that the striped population is in trouble and is being overfished. If we do not act now, these fish won't be around for future generations to enjoy.

I support the following

4.1

Tier 1

Option A-support A1

Option B-support B1

Option C-support C1

Tier 2

Option A-support A2

Option B-support B1

Option C-support C1

Tier 3

Option A-support A2

Option B-support B2

Tier 4

Support A

Tier 4.2

Option B support no measure

Option C- support C1,C2

Option D-support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Option B-support B1-a

Option C-support C3

Option D-support D2

Option E-support E2

Thank you for your time and taking our concerns into consideration.

Greg McSharry

Sent from my iPhone

**From:** [David Satow](#)  
**To:** [Comments](#)  
**Subject:** [External] Comment for Amendment 7  
**Date:** Friday, April 15, 2022 11:39:30 AM

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To whom it concerns,

Thank you for taking the time to read my letter. My name is David Satow, I have fished the New England coastline up and down from central Maine, Hampton Beach, Plum Island, Cape Cod and Montauk since I was 6 years old for Striped Bass. I began surf casting with my Dad and I will never forget the first bass I caught, a 28" which at the time was in the slot for keeping but insisted on releasing to swim another day because of the deep respect I have for these fish.

Fishing, and especially for striped bass is something we have always bonde over, and will continue to bond over. Furthermore I plan to try to create similar memories with my children in the future. As a result of this, I would like to see conservation equivalency done away with. Instead of this we need consistency along each coast to ensure the most success in creating a sustainable fishery that will last for generations. After hearing stories of people leaving from NH, catching their limit, returning the commercial catch they have caught then returning to Massachusetts coastline to do the same thing demonstrates the problems with the current regulations and lack of ability to hold people accountable.

Thank you for your time and consideration in this manner,  
David Satow

**From:** [Dennis Costigan](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 11:35:36 AM

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My name is Dennis Costigan from the state of Rhode Island. Striped bass are the peoples' fish. We need to work to preserve that tradition for future generations. We will never know if we over managed, but we will know if we didn't do enough. I would rather err on the side of over management. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Dennis Costigan

Providence, Rhode Island

Email: [dino6588@gmail.com](mailto:dino6588@gmail.com)

**From:** [Rich Blott](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 11:35:19 AM

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Dear ASMFC Members:

As you know, striped bass are one of the most important fish species on the eastern seaboard of the United States, from an ecological, cultural, and economic perspective. Conservation of Striped Bass is critical.

I urge you to support the below options for striped bass Amendment 7:

Tier 1:

Sub-option A1

Sub-option B1

Sub-option C1

Tier 2:

Sub-option A2

Sub-option B1

Sub-option C1

Tier 3:

Sub-option A2

Sub-option B2

Tier 4:

Option A (No deferred management plan)

Measures to address release mortality:

Sub-option C1

Sub-option C2

Sub-option D2

Rebuilding plan:

-Recruitment assumption

Option B

-Framework

Option B

Equivalency:

Sub-option B1-a

Sub-option C3

Sub-option D2

Sub-option E2

Thank you.

Richard Blott  
Darien, IL





**From:** [Jeffrey Reardon](#)  
**To:** [Comments](#)  
**Subject:** [External] Comments on Draft Amendment 7 to the Interstate Fishery Management Plan for Striped Bass  
**Date:** Friday, April 15, 2022 11:32:49 AM

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As background, I am a 55-year-old life-long saltwater angler who grew up on the coast of Maine, fishing Casco Bay, southern Maine beaches, and the Piscataqua River with my father and grandfather. As a kid, we did not target striped bass. Our fishing around the Piscataqua was focused on pollock, cod, and winter flounder, with the goal of filling the family freezer. I remember once spotting a striped bass in a small cove we were handlining for flounder—it was an experience we talked about for years. My grandparents rented an apartment to a marine biology graduate student at UNH; he wanted details, because seeing a striper in the Piscataqua in the late 1970's was a rare-enough event trigger the same kind of attention from faculty and fellow grad students that seeing a sturgeon did.

When I was bit older—old enough to drive, and with a job and some income to buy a salt water spinning rod—my saltwater fishing moved to the boom in bluefish that southern Maine saw in the early 1980's. This coincided with a huge abundance of menhaden. We'd drive local roads over salt marsh creeks and tidal rivers looking for schools of what we called pogies. When we found them, we knew we could go downstream to where the creek or river mouth hit the ocean and find bluefish that were pushing them up into the creeks. The fishing was fast and furious, mostly blitzing blues that would strike at anything we could put in front of them. It was hard on tackle and careless teenage fish handling of toothy fish that led to lots of bleeding fingers.

Very occasionally we'd see "an old guy" walking the beach, ignoring the bluefish blitz, and casting into the surf with big wooden plugs. They'd occasionally catch a stray bluefish—and react the way my trout-fishing father reacted when a fallfish sullied one of his dry flies. They were looking for striped bass, and once or twice a summer we'd see one of them catch one—almost always a big one, because that was all that was left.

I graduated from high school in 1985, leaving Maine for Massachusetts, New Jersey, and then Michigan, and came back to Maine in 1994 having not thought once about striped bass while I was gone. It was not part of my fishing heritage or history. I knew about striped bass, but to a Mainer who grew up in the 1980's, they were not on the angling menu. But implementation of the striped bass harvest moratorium, the Maine coast had exploded with them. One of my first nights back in Maine, in mid-June, I joined my parents for a walk on the beach, where we used to fish for bluefish, and the sandspit at the mouth of the river was covered with people casting fly rods. The beach and the rocks were covered with surfcasters. And all of them were catching fish—not bluefish, but striped bass, mostly small schoolies but a few approaching 30" or so. A week later my father gave me a 9 weight fly rod and reel and a small box of Clouser Minnows and Deceivers. The first night I took it to the beach I caught more than a dozen stripers. By 4<sup>th</sup> of July that summer I was hooked and also acquired a fly tying vice and a collection of fur and feathers that was sometimes covering the kitchen table in my apartment with an embarrassing mess when I brought a date home. I've been chasing striped bass ever since.

Last summer, fishing southern Maine by boat, I found a few stripers, but I caught as many American

shad as accidental by-catch as I did of the stripers I was targeting. Believe me when I say that I am happy to see the shad recovery, but catching about a dozen incidental shad does not compensate for the fact that fishing prime striped bass water that I know well on good tides had me land fewer than a dozen striped bass on 15 trips.

I am asking you to take serious measures to bring back the abundance we saw from the mid 1990's to the early 2010's—when there were striper anglers on every beach; when people planned their summer vacations and made careers as guides around striper fishing in Casco Bay—and Cape Cod, and Rhode Island, and the Jersey Shore. Focus on the health of the fish population—not the demands of the recreational and commercial and charter sectors who want to fight over their “fair share” of the catch. Take care of the fish—give them a few years to recover like you did 25 years ago—and let the fishing take care of itself when the striped bass stock recovers.

I am not a saltwater fisheries biologist, and I find Amendment 7 complicated, hard to understand, and full of uncertainty, so these comments are necessarily general.

1. Control striped bass mortality—especially mortality of spawning age females. Manage for abundance, not for maximum sustained yield by all of us users of the resource. I don't know that we've reach a point where another moratorium makes sense, but I do know that many of my angling and guide friends are beginning to push for one. They remember the 1980's, and how quickly recovery occurred once harvest pressure was removed.
2. Stop delaying action.
  - a. When female spawning stock biomass falls below your targets, act immediately to reduce fishing mortality. Be aggressive in doing so and set short timelines to rebuild biomass.
  - b. Adjust recruitment triggers by re-evaluating Juvenile Abundance Indices. We've seen a long period of reduced striped bass abundance in the northeast and have never seen the coastal stock trigger tripped. Again, manage for abundance, and act conservatively to return us to abundant stocks and maintain them.
  - c. Do not defer management actions if any management triggers are tripped. Act decisively. Hoping for a good year to happen at random is not management; it's avoiding your responsibility to manage.
3. Catch and Release Mortality. Address C+R mortality, but do not do so without outright closures, which will be unenforceable. (An exception may be protection of spawning aggregations.) Use gear restrictions (barbless hooks; circle hooks; single hooks; bait restrictions) to reduce mortality. Also consider limits—perhaps voluntary at first, with consistent messaging—on numbers of fish that can be caught and released. I long ago decided I'd stop fishing after catching a few. Establish an ethic of reducing the number of fish hooked and handled on the days when fishing is really good that goes along with the catch-and-release ethic than has been adopted by much of the recreational sector. Support education on fish handling and appropriate gear.
4. In some states, the line between recreational and commercial striped bass fishing is indistinct. I was shocked last summer when I fished a family member on the north shore of Massachusetts. As we met other anglers on the docks, almost every boat had someone who had acquired a commercial license so they could keep a > 35" trophy fish that Mass.

regulations would require to be released. Similar ambiguities exist in some states for charter operators who are allowed to sell their client's unwanted fish. Focus on reducing mortality—especially on larger fish that are legal in the commercial fishery but not the recreational sector. As noted above for reductions of C+R mortality, this is about both improving regulations and improving education directed at anglers.

5. End Conservation Equivalency. Use the long-term successful model of US FWS management of waterfowl, with consistent bag limits and season lengths throughout a flyway. This will both better protect striped bass spawning stock, and focus state attention where it belongs—on returning the stock to abundance that benefits all sectors—rather than on serving narrow regional constituencies.

Again, your focus should be on returning the striped bass stock to abundance. Keep your focus there, not on maintaining the status quo harvest demands of various state and local constituencies. An improved spawning stock and a return to striped bass abundance is good for all sectors. Please do not repeat the mistakes made just before I started fishing the salt that resulting an entire generation of east coast anglers who did not grew up during a period when striped bass were too rare to target. This time, act before a moratorium on recreational harvest is necessary.

Thank you,

Jeff Reardon  
267 Scribner Hill Road  
Manchester, ME 04351  
207 430 8441 (home and office)

**From:** [Willie](#)  
**Cc:** [Comments](#)  
**Subject:** [External] Comment for amendment 7  
**Date:** Friday, April 15, 2022 11:31:38 AM

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My name is William Shine and I am an avid surfcaster from the state of Massachusetts. I moved here from Ireland 6 years and I have to say there is no better feeling than being hooked up with a striped bass the best gamefish in the world. We need to protect this fishery and stop commercial bass fishing and also need to change the slot to 31-35 this gives bass a few more years to spawn. Please do the right thing and protect our already endangered striped bass population Thank you. William shine Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

William Shine  
Medford, Massachusetts  
Email: [willieshine@h](mailto:willieshine@h)

Sent from my iPhone

**From:** [Gary Allred](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Friday, April 15, 2022 11:30:06 AM

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To the ASMFC

My name is Gary Allred from Rhode Island, and I am responding to the Striped Bass Amendment 7 comments request for public comments on Amendment Seven for the management of striped bass.

Here are my choices for each proposed regulation.

4.1

Tier 1

A1

B1

C1

Tier 2

A2

B1

C1

Tier 3

A2

B2

Tier 4

A

4.2

B- None

C1, C2

D2

4.4.1

B

4.4.2

B

4.6.2

B1-a

C3

D2

E2

I recently moved to Rhode Island from Georgia, and grew up in North Carolina. I have fished for landlocked stripers most of my life, and was thrilled to now be living in the heart of the historic Atlantic Striper fishery. I very much want to see the species managed in a way that results in an abundance of healthy stock, so that we fishers can count on consistent action when we hit the water.

Please stand up for the striped bass, and end overfishing as quickly as possible. Please manage stripers for abundance, and not yield!

Thank you,

Gary Allred

Sent from my iPhone.

**From:** [Leeann Tombros](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 striped bass  
**Date:** Friday, April 15, 2022 11:26:59 AM

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To the ASMFC

My name is LeeAnn Tombros, I am from Massachusetts and I am responding to the request for public comments on Amendment Seven for the management of striped bass.

Here are my choices for each proposed regulation.

4.1

Tier 1

A1

B1

C1

Tier 2

A2

B1

C1

Tier 3

A2

B2

Tier 4

A

4.2

B- None

C1, C2

D2

4.4.1

B

4.4.2

B

4.6.2

B1-a



C3

D2

E2

The format was honestly really confusing and I think I made the right choices to save the striped bass. This decision is going to make a huge social and economic impact. Please consider the most stringent regulations to save this precious resource.

It's up to you guys to cave in and give in to certain powers and pressure. Will there be pain short term of course but in the long term it will be worth it.

Please stand up for the striped bass, and end overfishing as quickly as possible. Please manage stripers for abundance, and not yield!

Thank you,  
Lee Ann Tombros  
188 Oak St  
Pembroke MA 02359

**From:** [Lani Hummel](#)  
**To:** [Comments](#)  
**Cc:** [lanihummel@aol.com](mailto:lanihummel@aol.com)  
**Subject:** [External] Draft Amendment 7 Comments  
**Date:** Friday, April 15, 2022 11:19:06 AM

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Thank you for giving me the opportunity to provide the following preferences regarding the proposed policy for Amendment 7:

*4.1 Management Triggers*

*Tier 1: Fishing Mortality (F) Triggers Sub Options: A1, B1, C1*

*Tier 2: Female Spawning Stock Biomass (SSB) Management Triggers Sub-Options: A2, B1, C3*

*Tier 3: Recruitment Triggers – Sub Option: A2, B2*

*Tier 4: Deferred Management Action – Option: A, F*

*4.2.2 Measures to Address Recreational Release Mortality – Option: A, B2-a, D1*

*4.4.1 Recruitment Assumption for Rebuilding Calculation – Option: B*

*4.4.2 Rebuilding Plan Framework – Option: B*

*4.6.2 Management Program Equivalency – Option: B1-a, B1-c, C3, D1*

Thank you for your consideration,

Lani Hummel, 901 Bay Ridge Road, Annapolis, MD 21403

**From:** [blambiotte@comcast.net](mailto:blambiotte@comcast.net)  
**To:** [Comments](#)  
**Subject:** [External] Comments on Draft Amendment No. 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass  
**Date:** Friday, April 15, 2022 11:17:34 AM

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**To:** Members of the Atlantic Striped Bass Management Board, Atlantic States Marine Fisheries Commission

**Date:** April 15, 2022

**Subject:** Comments on Draft Amendment No. 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass

Dear Members of the Board:

My name is Benjamin J. Lambiotte. I am a life-long recreational angler, residing in Maryland. I have lived and actively fished in and around the Chesapeake Bay and Atlantic beaches and estuaries for over 40 years. The Atlantic Striped Bass is and always has been my most revered target species. Over the years, I have fished on for rockfish from shore, with chartered professional guides, from my own and friends' boats, and lately, from a fishing kayak. I generally use a fly rod or light spinning tackle, and seldom troll or use multiple-hook rigs. Needless to say, I spend a fair amount of my income (my wife would say too much) on fishing. With respect to our beloved striped bass specifically, I have always been troubled by personal observations of wasteful overfishing and constant introduction of "innovative" techniques and hardware that only increase mortality. I have lived through at least 2 near collapses of the fishery, which only years of restrictions and careful management have overcome. Overfishing, poor spawning and habitat issues are once again hurting the striper fishery. For many years, I have practiced catch and release on stripers predominantly, piously mashing down my barbs and using circle hooks, thinking I was doing my part, and blaming commercial fisheries for the decline in stocks. But over the years, I have learned (and personally observed) that we well-meaning recreational anglers, even those practicing C&R, take a mortality toll, and I do not doubt the accuracy of the recent survey data on that. I also think that the effects of climate change – low oxygen levels, dead spots in the Bay and very warm water temperatures – contribute to higher mortality of even properly revived and released fish. So I applaud the Board for approaching management of the striper fishery in an forward-looking, integrated manner, focusing both on commercial and recreational impacts. To continue to reap the rich economic, recreational, and culinary rewards striped bass have given America for centuries, it imperative to carefully manage for an abundant, stable, and sustainable stock of fish over the long haul; not to just focus on a season at a time; nor to adopt "wait and see" approaches that allow action to be deferred until it is too late.

I recognize how extraordinarily difficult it is to balance all of the competing and conflicting interests of the many direct and indirect stakeholders in this fishery. In my view, a range of effective measures should exist to protect, preserve and increase striped bass stocks, and to have available regulatory and law enforcement "tools" necessary to respond quickly to emergent conditions, threats and stressors, without having to waste precious time and resources seeking consensus among all stakeholders that is all but impossible to find. So I generally favor data-centric statistical "triggers" that would cause a conservation measure to go into effect, without further "process," and relatively short "measuring periods," so that the lag time between detection of excessive mortality or lackluster spawning stock and conservation action is reduced.

My comments on the specific measures under consideration follow:

#### **4.1 Management Triggers**

##### **Tier 1: Fishing Mortality (F) Triggers:**

Option A: Timeline to Reduce F to the Target Preferred Alternative: I favor **Sub-option A1** (status quo): Reduce F to a level that is at or below the target within one year.

Option B: F Threshold Triggers Preferred Alternative: I favor **Suboption B1** (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

Option C: Option C: F Target Triggers Preferred Alternative — **Suboption C1** (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under suboption A.

The goal here should be to eliminate as much as possible delays in regulatory action after overfishing or other excessive mortality issues are detected in the data. As such, a one year measuring period as used now, coupled with prompt implementation of appropriate conservation measures, seems appropriate.

### **Tier 2: Spawning Stock Biomass (SSB) Triggers:**

Option A: Deadline to Implement a Rebuilding Plan Preferred Alternative Rationale: I favor **Suboption A2**: Two Year Deadline to Implement a Rebuilding Plan. Again the goal should be to assure prompt action after a season in which spawning stock issues are detected.

Option B: SSB Threshold Trigger Preferred Alternative — I favor **Suboption B1** (status quo). Eliminating an SSB trigger is foolish and makes no sense.

Option C: SS B Target Trigger Preferred Alternative — I favor **Suboption C1** (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years]. This recognizes the basic cumulative impact relationship between F (mortality) and SSB (breeding stock), which is only common sense.

### **Tier 3: Recruitment Triggers**

Option A: Recruitment Trigger Definition Preferred Alternative: I prefer **Sub-Option A2**: The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA) shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

Option B: Management Response to Recruitment Trigger: I favor **Sub-option B2**: If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

In combination, an objective quantitative benchmark “trigger,” and specific direction on management actions to be taken in the event it is tripped, should help assure an effective response to the critical problem of fewer juvenile fish.

### **Tier 4: Deferred Management Action**

I favor **Option A** (status quo): No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond.

Again, I am in favor of proactive management, driven by data showing that action “triggers” have been met.

### **Section 4.2.2 - Measures to Address Recreational Release Mortality**

Effort Controls (Seasonal Closures) – While I am not fundamentally opposed to the concept of seasonal closures where warranted or to protect the spawn, they must be based on objective and consistently applied measuring methodology and data. At this time, I cannot and **do not support any of the Option B alternatives**, as proposed. There is insufficient detail in the Draft proposal concerning standards and methods to be used to determine exactly where, when and whether these closures would be imposed. Also, the proposed recreational-only spawning closures will be ineffective (and inequitable) if not also applicable to the commercial fishery, which uses indiscriminant high-mortality techniques such as gill netting. I suggest you go back to the drawing board on this one.

Additional Gear Restrictions: I favor **Sub-Option C1**, prohibiting use of lethal devices to pull striped bass from the water, and **Sub-Option C2**, requiring that any fish taken by unapproved method would be returned to the water immediately without unnecessary injury.

Outreach and Education: I prefer **Sub-Option D2** – All states should promote and educate fishers on best handling techniques to reduce mortality.

#### **Section 4.4 -- Rebuilding Plan**

4.4.1 Recruitment Assumption for Rebuilding Calculation: I favor **Option B**: Rebuild female SSB to the SSB target level by no later than 2029. Fishing mortality MUST be adjusted to account for the recent decline in spawning success of striped bass to restore the fishery, even if it causes some pain in the short run.

4.4.2 Rebuilding Plan Framework: I support **Option B**: 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 recruitment assumption specified in Amendment 7) 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.

The Board urgently needs to address implementation of a rebuilding plan for the striped bass stock, which was declared overfished approximately three years ago. Rapid action responding to recent poor recruitment is essential to restore the stock to the target by 2029.

#### **Section 4.6.2 - Management Program Equivalency**

Option B: Restricting Use of Conservation Equivalency (CE): I support **Sub-Option B1**, any Conservation Equivalency should not be approved if a stock is overfished.

Option C: Precision standards for MRIP Estimates for CE Proposals: I am in favor of **Option C3**, meaning that CE proposals should not be able to use Marine Recreational Information Program estimates, associated with percent standard error greater than 30%.

Option D: CE Uncertainty Buffer for Non-Quota Managed Fisheries: I support **Sub-Option D2**, requiring an uncertainty buffer of 25% all CE programs for non-quota-managed fisheries.

Option E: Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries: I prefer **Sub-Option E2** - proposed CE programs must demonstrate equivalency based on the FMP standard percent reduction at the state-specific level.

I am very grateful to the Board for this opportunity to submit comments on Draft Amendment 7, from the perspective of an active, conservation-minded Maryland recreational striped bass fisherman. Seeking, catching (often on a fly I tied myself) and releasing in good condition this beautiful native fish is and has been one of the joys of my life. I have passed on my passion for *Morone saxatilis* to my nephew, and it is my sincere wish that abundant stocks of this amazing species will always be there for him, and his children, and their children to learn about and enjoy. And that they will continue to be a valuable economic resource for the Atlantic Seaboard. All of that depends on an abundant and sustainable fishery, and that requires vigilance, data collection, scientific rigor, sensible standards, and active conservation and management. I understand restoration and sustaining stocks may occasionally require some temporary sacrifices on the parts of commercial and recreational fishers alike. But over the long haul, those have proved to be well worth the price in the past.

Benjamin J. Lambiotte

Takoma Park, MD

**From:** [Caparell, Nicholas](#)  
**To:** [Comments](#)  
**Subject:** [External] striped bass fishery  
**Date:** Friday, April 15, 2022 11:12:35 AM

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Hello - My name is Nick Caparell from Plymouth, Massachusetts. Like many across the northeast atlantic coast, I am worried about the state of affairs with our striped bass fishery.

A fellow my fishing cape cod associate member of mine named Dex Chadsey summed up a great email that I would like to echo as I agree with it wholeheartedly. Everyone (recreational or commercial) has a major impact on this species and we turn to experts to do the right thing in devising a real proper plan & change to allow this species to thrive once again. Below is Dex's messaging that I again 100% agree with. Please hear the concerned voices, we all deeply care about this fishery and the future of it.

Thank you - Nick Caparell

*I am a recreational surfcaster from Massachusetts, fishing primarily for Striped Bass in the waters of Cape Cod, Cuttyhunk, and Block Island. I am alarmed by the decline of Striped Bass stocks and the lack of recent overall spawning success.*

*I am also sickened by the selfish, disgusting behavior of those people who abuse this resource by poaching and practicing what is known as "high grading". People who intentionally take fish that are too small, take too many, or toss a dead fish into the water so they can keep a larger one. To see the white bellies of several dead 20 pound bass floating in the current of the Cape Cod Canal pushes one to a point beyond anger.*

*I believe that we cannot only blame others nor demand sacrifices from only those who fish differently or in other geographical areas than we do. Traditionally, recreationals blame the commercials, surf guys blame the boat guys, beach guys blame the Canal guys, we all need to bear a part of the blame and be part of the solution.*

*I strongly support a slot limit for Striped Bass but believe that the current 28" minimum does not give enough fish the needed spawning time. A 28" minimum only allows 3 years of spawning time while a 31" minimum would allow 4 - 5 years for a Bass to spawn before possibly being killed. I support a 31" - 35" slot limit. This slot limit should be enforced uniformly all along the Atlantic Coast. To allow different regulations on a migrating fish is ludicrous.*

*As a Massachusetts and Cape Cod Canal Fisherman, I support the present regulation of no commercial fishing in the Canal. I also believe that the Cape Cod Canal should be catch and release only, but that is probably a discussion for another day. The fish are just too vulnerable in that stretch of water, particularly the larger fish.*

*As far as commercial regulations go, I understand allowing commercial fishermen to take a greater number of fish than recreational fishermen. What I don't understand is allowing them to take large numbers of the larger fish. This is absolutely counter productive to the goal of improving spawning success of the Striped Bass bio mass. The larger fish need to be saved, not killed. This seems like a sellout by regulators to me.*

*I support the use of circle hooks when bait fishing and I started using them several years ago to avoid the gut hooking of fish that happens when using J hooks.*

*I strongly support making Striped Bass a sport fish that can be taken by rod and reel only. I am haunted by the massive hauls of large bass that I see as a result of shore based netting from some areas of the Atlantic Coast. Certain historical methods of fishing, such as the fish weirs we see in Cape Cod Bay, or the nets off the West Wall in Rhode Island, are glamorized and declared a never ending right for those who now take more than their share at a time when the resource can not withstand that amount of reduction. I have seen this pattern repeated multiple times in the fishing industry. The resource is overfished by those who are in it for the quick buck without any regard for sustaining the fishery. Then they all cry poor and ask for government subsidies when there are no more fish to catch. Swordfish, Cod, Flounder, Menhaden and large Blue Fin Tuna have all been decimated in this way. Fishermen don't have a perpetual right to fish a certain way just because their great, great Grampa did that 100 years ago. If that argument was used in the business world the government would be subsidizing the production of 8 track tapes!*

*I also can not understand why the Striped Bass are allowed to be hammered all winter long as they hold off the mid Atlantic Coast. They are exceedingly vulnerable. We have all seen the photo of the young woman sitting on top of the pile of huge Striped Bass as the charter boat makes it's way back to port. The excess is disgusting!*

*I support the restriction of fishing for Striped Bass in spawning areas during the time of year they are spawning. It makes no sense to cause stress or eliminate large Bass full of eggs before they have a chance to spawn.*

**From:** [jepanz@gmail.com](mailto:jepanz@gmail.com)  
**To:** [Comments](#); [Justin Davis](#); [Matthew Gates](#); [William.a.hyatt@snet.net](mailto:William.a.hyatt@snet.net); [ROBERT LAFRANCE](#); [Sen. Craig A. Miner](#); [Rep. Melissa Ziobron](#)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Friday, April 15, 2022 11:03:54 AM

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

Attention Ms. Franke and ASMFC Commissioners,

I write today with urgency to provide comment on Striped Bass Amendment 7. I am a Connecticut resident and avid saltwater fisherman for 30 years. Fishing for striped bass on our coast has been a lifelong endeavor.

Pointedly, my pursuit of striped bass has directly resulted in economic benefit to small businesses in all states represented within the ASMFC. In the past 12 months alone, my family and I have travelled our coast from Maine to North Carolina, with the draw of fishing for striped bass ever-present. Over the years, hotels, restaurants, event venues, transport, tackle & fly shops, fishing guides, fly tiers and material suppliers, tackle, gear and apparel manufacturers have all benefited from this writer's passion for striped bass. To the Commissioners, I also underscore the sales taxes collected, state and/or municipal parking fees, fishing licenses and beach access permits that have enriched both my home state of Connecticut and other jurisdictions represented within the ASMFC. The striped bass is the current pulsing through all of this economic activity for me and every other fisherman on our coast who is just like me, and all of this economic activity is today at risk.

As a fisherman spending days on end year after year fishing for stripers, I know the striped bass fishery is in trouble. The fish are smaller, there are fewer of them and they are not abundant in the places where they used to be just a few years ago. The ASMFC needs to act with urgency and in the best interest of striped bass. Importantly, this means (1) ending the overfishing occurring and the presently overfished condition of the striped bass fishery and (2) managing the striped bass population to abundance - not yield. Specifically, I support the following options and provisions of Amendment Seven:

#### 4.1 Management Triggers:

Tier 1: Fishing Mortality (F) Triggers

Option A: I support Sub-option A1. Reduce F to a level that is at or below the target within one year.

Option B: I support Sub-option B1. If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.



Option C: I support Sub-option C1. If F exceeds the F target for two consecutive years and female Spawning Stock Biomass (SSB) falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

Tier 2: Spawning Stock (SSB) Biomass Triggers.

Option A: I support Sub-Option A2. Two-year Deadline to implement a rebuilding plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

Option B: I support Sub-Option B1. If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe not to exceed ten years.

Option C: I support Sub-Option C1. If female SSB falls below the target for two consecutive years and F exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe not to exceed ten years.

Tier 3: Recruitment Triggers.

Option A: I support Sub-option A2. The recruitment trigger is tripped when any of the four juvenile abundance indices (JAI) used in the stock assessment model to estimate recruitment shows an index value that is below 75% of all values in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

Option B: I support Sub-option B2. If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

Tier 4: Deferred Management Plan.

I support Option A. No Deferred Management Action.

#### 4.2.2 Measures to Address Recreational Release Mortality.

Option C : I support Sub-options C1 and C2. Restrict the use of lethal devices (i.e. gaffs) to remove striped bass from the water (C1) and require the release of any striped bass caught by any unapproved method to be returned to the water immediately without unnecessary injury (C2).

Option D: I support Sub-Option D2.

#### 4.4.1 Recruitment Assumption for Rebuilding Calculation.

Option B: I support Sub-option B. Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low

recruitment regime assumption as identified by the change point analysis.

#### 4.4.2 Rebuilding Plan Framework.

Option B. I support Option B. 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 recruitment assumption specified in Amendment 7) 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 by Board action.

#### 4.6.2 Management Program Equivalency

Option B: Restrict Use of Conservation Equivalency (CE) Based on Stock Status.

I support Sub-option B1-a. CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

Option C: Precision Standards for MRIP Estimates Used in CE Proposals

I support Sub-option C3. CE proposals would not be able to use MRIP estimates associated with a percent standard error exceeding 30%.

Option D. CE Uncertainty Buffer for Non-Quota Managed Fisheries

Option D. I support Sub-Option D2. Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

Option E. I support Sub-option E2. Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state-specific level.

To close in brief, I caught my first striped bass as by-catch on a bluefish party boat charter out of Niantic, Connecticut as a teen in the late 1980's. It was a 'unicorn' at that low time in the history of striped bass management. I urge the ASMFC and its Commissioners to heed the lessons that history provides regarding the failures of striped bass management and to act expeditiously in protecting this precious resource.

Regards,  
Jeff Panzo  
Fairfield, Connecticut

**From:** [Lou Merlino](#)  
**To:** [Comments](#)  
**Cc:** [Lou Merlino](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 10:56:41 AM

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Hello Emilie!

My Name is Lou Merlino and I have been a "Striper" fisherman on the Hudson River for almost 40 years. I'll start by thanking you for putting hard work into such a difficult problem... I'm sure it can't be easy. I would just like to send a couple of comments on the Draft Amendment 7 proposals that have been put forward.

First, over the years, I have seen the striper population rise and fall a few times. I have no problem doing my part to sustain a healthy population. I've recently had to adhere to a slot limit as well as use of circle hooks while using live bait. I am concerned because Amendment 7 seems to target Hudson River fishing in a disproportionate way. The spawning fish are available to target for six to eight weeks tops in our area. To cut off any angling time on the Hudson would be very disruptive, both recreationally and economically. It is true that the fish are congregated in a tighter pattern while in the river, but as our season ends, the sound/ocean fishing heats up with anglers targeting these same fish from June until November... all with different size limits. It makes no sense that I am protecting fish that will not be protected in other waters. Also, for other sports fish that have struggled in the past throughout the country, I have seen regulations like artificial lures only, or requirements for all bait hooks to be barbless. History has proven that these techniques save fish.

Second, I saw very little in the way of addressing commercial fishing for these great fish. The bottom line is that a spawner is a spawner. Whether it's at the end of my pole or a commercial fisherman's net. To separate requirements along the harvest chain is not only illogical, but detrimental to sustaining a healthy striped bass population.

Third, when I first started fishing on the Hudson, a striped bass fish hatchery was in operation down in Verplank. There is NO doubt that the success of returning striped bass in the Hudson is almost totally due to the operation of that hatchery. For more than 20 years prior to the hatchery, no stripers were making past the auto plants being operated on the lower Hudson River. Please consider constructing a hatchery for stripers. We do it in this state for trout, a fish that has healthy reproducing populations in many New York waters, why not have at least one for a majestic sports fish that defines the resilience of this great Hudson River. Once constructed, this hatchery would represent a very small fraction of the cost to amend regulations over and over again.

Thanks again for the opportunity to express my thoughts on this subject that is near & dear to my heart.

Best of Luck....  
Lou Merlino

**From:** [Andrew Murphy](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 10:51:46 AM

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I cannot stress how important striped bass fishing has been in my life and now career. Accessible to the common man and found in all habitats, this emblematic fish must be better protected. As we face uncertain challenges, we must vouch for a strong management strategy that puts the fish forward and avoid the harsh declines the fish has already known.

I support the following amendments :

**4.1 Management Triggers**

Tier 1

- Sub-Option A1
- Sub-Option B1
- Sub-Option C1

Tier 2

- Sub-Option A2
- Sub-Option B1
- Sub-Option C1

Tier 3

- Sub-Option A2
- Sub-Option B2

Tier 4

-Option A

**4.2.2 Measures to Address Recreational Release Mortality**

Option C

- Sub-Option C1
- Sub Option C2

Option D

- Sub Option D2

**4.4 Rebuilding Plan**

**4.4.1 Recruitment Assumption for Rebuilding Calculation**

Option B

**4.4.2 Rebuilding Plan Framework**

Option B

**4.6.2 Management Program Equivalency**

Option B

- Sub-Option B1-a

Option C

- Sub-Option C3

Option D

- Sub-Option D2

Option E

- Sub-Option E2

Sent from my iPhone

**From:** [Jackson F](#)  
**To:** [Comments](#)  
**Subject:** [External] Striper Lives Matter  
**Date:** Friday, April 15, 2022 10:51:42 AM

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Hello, my is Jackson Frend

I am 15 years old and live on the North Fork of Long Island, NY. I am obsessed with saltwater fly fishing and my favorite species to target is the striped bass. I have been chasing this beautiful species my whole life and I have always been fascinated by these fish. The striper is a fish I plan on fishing for in the future but we recently are facing a big issue across the East Coast and that is the decline of stripers. Stripers are loved by everyone in the fishing community. It's truly sad to see this beloved species dying off due to us fisherman. In order to restore this important fishery we need to think fast and really put Amendment 7 into play. Throughout the years the commercial and recreational fisherman have been disrespecting this valuable species by killing them for food or cash. But the striped bass is worth more alive than dead. Whenever I go out to enjoy some time on the water that joy is soon crushed because I will always see charter boats and commercial boats come in with a boat load of dead fish especially stripers. Those charter boats and commercial boats have multiple trips a day during each day of the season and on each trip hundreds of stripers as well of other types of fish are brought back dead. All these people see is cash when they look at a striper and soon enough they aren't even gonna have money to go out because they will fish themselves out of business. I work at a seafood market and whenever I walk into the back I will see a local commercial fisherman dropping off his catch and most of the time they are stripers and there is a lot of them in the multiple coolers the commercial fisherman has. When stripers are caught they should be handled with care and safely released back into the water to ensure that they are going to survive and go off to produce more fish. It is not every year stripers have a good breeding season in the Hudson River and Chesapeake Bay. The class of fish that are really producing fish is the 2015 class fish. This class of stripers are the ones being killed because they are right in the slot limit between 28-35". Amendment 7 will help protect this class and as well as the other classes of stripers. I do not want another striper crash to happen. If nothing is done about this fishery the stripers will suffer and become extinct. These fish are important to have around due to the fact that they help determine if the water system is healthy and they help control the population of baitfish as well as other sea critters and they also keep people like me happy. There is nothing better than a striper grabbing your lure and seeing that fish swim off strong after the quick tussling match you and the fish just had. Thank you for your time and consideration.

Sincerely, Jackson Frend

**From:** [Joe DeLuca](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 10:50:16 AM

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Long time fisherman, growing up fishing with family and friends. We need to do everything possible to properly preserve and restore the fish population. Commercial fishing and keepers should be limited drastically to assist in ensuring that the Striped Bass species rebuilds back to the appropriate numbers.

I'm hoping to be able to one day share my love for the catch and release surf and boat fishing with my kids but am concerned that this not be possible if we don't act now.

This should not be about business and making money. This should be about preserving one of the few hobbies that nature still has to offer.

Teach Proper CATCH & RELEASE.  
Restrict limits for keepers.  
Promote Healthy Catch & Release Practices.  
Promote Quality Equipment to Properly Release Fish.

Thanks,  
Joe

Joseph DeLuca, P.E.  
Project Manager

**Nelson & Pope**  
**Engineers & Surveyors**  
70 Maxess Road  
Melville, NY 11747  
T: 631.427.5665  
C: 631.258.0889  
E: [Joseph.DeLucaJA@gmail.com](mailto:Joseph.DeLucaJA@gmail.com)

**From:** [Gregory Fabso](#)  
**To:** [Comments](#)  
**Cc:** [stripcomments@gmail.com](mailto:stripcomments@gmail.com)  
**Subject:** [External] STRIPED BASS AMENDMENT 7 SUBMISSION  
**Date:** Friday, April 15, 2022 10:49:35 AM

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To whom may listen below is my stance on the striped bass amendment No. 7 and the current state of the Striped Bass fishery. I am an avid recreational fisherman fishing Connecticut & Rhode Island waters. I have experienced a major decline in the size and quantity of Striped Bass caught amongst me and my fellow anglers in the past decade.

I have two young children (1 & 2 years old) that I hope someday to share the great joy of fishing for the American Striped Bass. With the power of your position I hope you pass an amendment that will save the Striped Bass from continuous decline and potential extinction.

## **STRIPED BASS AMENDMENT 7**

### **4.1 MANAGEMENT TRIGGERS**

#### **TIER 1: FISHING MORTALITY (F) TRIGGERS**

OPTION A - I SUPPORT SUB-OPTION A1  
OPTION B - I SUPPORT SUB-OPTION B1  
OPTION C - I SUPPORT SUB-OPTION C1

#### **TIER 2: SPAWNING STOCK (SSB) BIOMASS TRIGGERS**

OPTION A - I SUPPORT SUB-OPTION A2  
OPTION B - I SUPPORT SUB-OPTION B1  
OPTION C - I SUPPORT SUB-OPTION C1

#### **TIER 3: RECRUITMENT TRIGGERS**

OPTION A - I SUPPORT SUB-OPTION A2  
OPTION B - I SUPPORT SUB-OPTION B2

#### **TIER 4: DEFERRED MANAGEMENT PLAN**

OPTION A - I SUPPORT OPTION A

### **4.2.2 MEASURES TO ADDRESS RECREATIONAL RELEASE MORTALITY**

#### **OPTION C: ADDITIONAL GEAR RESTRICTIONS**

OPTION C - I SUPPORT SUB-OPTION C1  
OPTION C - I SUPPORT SUB-OPTION C2

#### **OPTION D: OUTREACH AND EDUCATION**

OPTION D - I SUPPORT SUB-OPTION D2

### **4.4 REBUILDING PLAN**

4.4.1 RECRUITMENT ASSUMPTION FOR REBUILDING PLAN  
FRAMEWORK

OPTION B - I SUPPORT OPTION B

4.4.2 REBUILDING PLAN FRAMEWORK

OPTION B - I SUPPORT OPTION B

**4.6.2 MANAGEMENT PROGRAM EQUIVALENCY**

OPTION B: RESTRICT USE OF CONSERVATION  
EQUIVALENCY (CE) BASED ON STOCK STATUS

OPTION B - I SUPPORT SUB-OPTION B1-a

OPTION C: PRECISION STANDARDS FOR MRIP ESTIMATES  
USED ON CE PROPOSALS

OPTION C - I SUPPORT SUB-OPTION C3

OPTION D: CE UNCERTAINTY BUFFER FOR NON-QUOTA  
MANAGED FISHERIES

OPTION D- I SUPPORT SUB-OPTION D2

OPTION E: DEFINITION OF EQUIVALENCY FOR CE  
PROPOSALS WITH NON-QUOTA MANAGED FISHERIES

OPTION E - I SUPPORT OPTION E2

PLEASE choose a corrective action to support the population of this exceptional species.

Sincerely,

Gregory Fabso  
61 Shagbark Ln  
Fairfield, CT 06824



**From:** [Kellene Falco](#)  
**To:** [Comments](#); [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Cc:** [Michael Armstrong](#); [Dan Mckiernan](#); [Raymond Kane](#); [Rep. Sarah K. Peake](#); [LOWELL WHITNEY](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 10:48:20 AM

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Hi,

Every year myself & our boys go out fishing for striped bass. We have years of memories of spending time together and fishing. I hope someday my sons will be able to carry on this tradition to their children and grandchildren.

I implore you to institute catch & release to save the stripe bass and protect the fish stocks.

I agree fully with the stance of the American Saltwater Guide Association.

Thank you,

*Jeff Schofield*

Schofield Properties, LLC/Tarkiln Village, LLC  
160 Old Derby St, Suite 1000  
Hingham, MA 02043

**From:** [Phoenix Russell](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped bass public comment  
**Date:** Friday, April 15, 2022 10:47:44 AM

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Hello Emilie,

My name is Phoenix Rogers. I am a female angler from Martha's Vineyard. Over the last 10 years I have watched the decline of the striped bass fishery where I live on the vineyard. It's been at least 5 years since I caught a fish over 36". My husband and I practice catch and release only with these fish. While we know there can be a mortality rate, we take all precautions necessary for their greatest success. I've seen catch and release and harvest regulations change in my years fishing. I've seen striped bass removed from our local tournament because the number were so low. I'd love to see a universal management plan for these fish along the east coast. Hooks, slots sizes, harvest quota among recreational and commercial (if commercial wasn't removed all together. Do we really need to eat these fish?).

While I love catching these fish, what's more important to me is their future. I would do whatever it takes to see their number rise, especially on the large breeding stock.

We have noticed over the years the juvenile abundance has changed. Cookie cutter sized fish which tells us on certain years the bass reproduction was more successful then others and zero large fish which means they have all been harvested or deceased. The female spawning stock needs to be protected at all cost. We've seen management with other species that protect the breeding females. Why would we not do that for striped bass as well?

Changing hooks, zero harvest, restricted fishing areas, closed spawning periods. All these regulations could help protect the fish people travel from around the globe to catch.

Let's all come together to protect their future for generations to come.

Thank you for your time. These fish are so important.

Phoenix Rogers  
Martha's Vineyard  
5085643180

Sent from my iPhone

**From:** [jesse.gustafson@unlimitedsir.com](mailto:jesse.gustafson@unlimitedsir.com)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass  
**Date:** Friday, April 15, 2022 10:45:46 AM

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Hello! My name is Jesse Gustafson. I'm a 44 year old surfcaster from Boston. The striped bass is important to me as a recreational fisherman. I have practiced catch & release for the 35+ years of non-stop angling. As a kid I remember the fishery being not so great...then became plentiful, then became decent, to where we are now...overfished. Watching commercial fishermen take countless breeding sized fish (in addition to everything else they keep) is NOT good for the longevity of this fishery. I don't want to see anyone lose their livelihood BUT the livelihood will no longer exist if we keep things up the way they currently are.

Please protect these incredible gamefish for future generations to enjoy.

Regards,  
-Jesse Gustafson



Jesse Gustafson  
Sales Team Leader  
Unlimited Sotheby's International Realty  
1334 Beacon Street  
Brookline, MA 02446  
Direct: 617-642-4787  
Email: [jesse.gustafson@UnlimitedSIR.com](mailto:jesse.gustafson@UnlimitedSIR.com)  
[JesseGustafson.com](http://JesseGustafson.com)  
See my Linked In Profile [HERE](#)

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Equal Housing Opportunity

**From:** [Marcus LaRobardiere](#)  
**To:** [Comments; stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7 - ASMFC Striper Management Public Comment  
**Date:** Friday, April 15, 2022 10:43:29 AM

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Hello Ms. Franke and fellow members of the ASMFC Atlantic Striped Bass Management Board,

The first time I caught a striped bass was on the Hudson River. I was eight years old. A week ahead of our charter, the captain had informed my dad that they had caught a bass that was just under 40 inches. To me, I dreamed night after night about catching a striped bass bigger than myself—I nearly did.

This was the beginning of a love affair with this beautiful fish. Now, 25 years later, I hope my two-year-old son gets to have the same experience. Today, I fear, this is more of a dream than reality.

Our fishery is in trouble. The population decline is noticeable, and alarming. It is my fear that we have only a few years to make the necessary changes to salvage this resource, and bring joy back to recreational anglers like myself, and future generations.

I'm thankful that I have a chance to voice my opinion during this public commenting period, and I am thankful for the opportunity to share my thoughts.

**Tier 1: Fishing Mortality (F) Triggers:** Management makes the most sense when science-based data is applied to the policy principles and adoption. With the target of longevity for both recreational and commercial anglers, it's best to adjust management levels based on the mortality targets and spawning stock biomass targets; these should be considered as dependent variables when fluctuations occur. i.e. If mortality rates increase for two consecutive years and the spawning stock biomass falls below target in either year, then management must be amended to reduce the mortality rate overall.

**Tier 2: Spawning Stock Biomass (SSB) Triggers:** This should be constantly managed as reportable data indicates that SSB falls below the threshold. A rebuilding stock program should be implemented as this is a federal requirement via Magnuson-Stevens Act. Further, this should be managed similarly to my comments in Tier 1 on a relationship basis with fishing mortality thresholds and biomass reproduction.

If SSB decreases below threshold indicating a poor breeding season, then mortality rates must be adjusted; this is not punitive to commercial, but should be seen as supportive to provide for longevity of keep.

**Efforts Controls (seasonal closures):** Any two-week period of seasonal closures is a band-aid to a larger problem. Recreational angling is primarily catch-and-release, and this would be inappropriately punitive to the community. However, it would make sense to implement a two-week seasonal closure on catch-and-keep. This would allow for angling, but preserve stock. Additionally, heightened law enforcement and harsher penalties would deter anglers looking to break the law.

**Additional Gear Restrictions:** Prohibit recreational anglers using lethal devices in an effort

to pull the striper from the water or assist in releasing. Additionally, the promotion and support of nets must be of material that protects the fish (think trout fishing: no rope, string nets).

#### **4.4 Rebuilding Plan**

##### **4.4.1 Recruitment Assumption for Rebuilding Calculation - Prefer option B**

##### **4.4.2 Rebuilding Plan Framework - Prefer option B**

**4.6.2 Management Program Equivalency** - I do not support Conservation Equivalency (CE) programs. This is an illogical way to support the longevity of the biomass for the benefit of both recreational and commercial anglers. Rather, it is fair and equitable for individual states to bear the proportionate burden when a reduction in mortality is necessary. This hopefully, will result in a future coastwide target.

Thank you for the opportunity to hear our comments and take them into consideration.

It is my hope that in my lifetime, and that of my son's, we will have a thriving, healthy and majestic fishery that will rebound and live on for generations.

Marcus

**Marcus LaRobardiere**

Boston, MA | (617) 955-1225

**From:** [chris gonver](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 10:38:57 AM

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Good morning,

I am a recreational saltwater angler that primarily targets Striped Bass around Cape Cod since 2013. During that time I have seen a dramatic decrease in the population and size of the biomass. Sure, there are isolated pockets of bigger fish that pop up in different areas and some larger schools of “schoolie” size fish, but the number of these fish have been dramatically reduced and are very difficult to locate. Every angler that I have spoken to has expressed the same concern. I take my seven year old son fishing with me every chance I get and he asks every time to fish for the “big stripers that pull hard” and I have to tell him its going to be really tough. I really hope that these Amendment 7 regulations will overwhelmingly be geared towards abundancy and what is best for the Striped Bass so my son can continue to experience the wonderful fishery that we have had. My fellow anglers and I believe that accountability is crucial and we will be tracking the decisions that are made.

I am aligned with American Saltwater Guides Association and concur with the below recommendations:

#### **4.1 Management Triggers**

Tier 1: Fishing Mortality (F) Triggers

##### **Option A: Timeline to Reduce F to the Target**

**ASGA Supports Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year.

##### **Option B: F Threshold Triggers**

**ASGA Supports Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

##### **Option C: F Target Triggers**

**ASGA Supports Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

Tier 2: Spawning Stock Biomass (SSB) Triggers

##### **Option A: Deadline to Implement a Rebuilding Plan**

**ASGA Supports Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

### **Option B: SSB Threshold Trigger**

**ASGA Supports Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

### **Option C: SSB Target Trigger**

**ASGA Supports Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

Tier 3: Recruitment Triggers

### **Option A: Recruitment Trigger Definition**

**ASGA Supports Sub-option A2:** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

### **Option B: Management Response to Recruitment Trigger**

**ASGA Supports Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

Tier 4: Deferred Management Action

### **ASGA Supports Option A (status quo): No Deferred Management Action.**

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

### **4.2.2 Measures to Address Recreational Release Mortality**

#### **Option C. Additional Gear Restrictions**

**ASGA Supports Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**ASGA Supports Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

#### **Option D. Outreach and Education**

**ASGA Supports Sub-option D2:** It is recommended states continue to promote best striped

bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

#### **4.4 Rebuilding Plan**

##### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

**ASGA Supports Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

##### **4.4.2 Rebuilding Plan Framework**

**ASGA Supports Option B:** 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 recruitment assumption specified in Amendment 7) 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.

##### **4.6.2 Management Program Equivalency (Conservation Equivalency)**

###### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

**ASGA Supports Sub-option B1-a:** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

###### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

**ASGA Supports Sub-option C3:** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

###### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

**ASGA Supports Sub-option D2:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

###### **Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

**ASGA Supports Sub-option E2:** the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Thank you for taking the time to read my comments!

Respectfully,



Chris Gonyer

**From:** [Brendan Pembroke](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 10:27:50 AM

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Hello Ms Franke and the Atlantic Striped Bass Management Board,  
My name is Brendan Pembroke from Duxbury, MA. I'm a life long fisherman who practices the catch and release of striped bass from April to November of each year. In more recent years, striped bass fishing has had a profound impact on my life - contributing to my sobriety from alcohol and overcoming depression & managing anxiety. Striped bass fishing connects myself and many others with nature, cementing us the present.

There is an intimate sense of community that exists amongst those of us who fish for striped bass. It is rooted in an appreciation for nature and mutual respect for a species which contributes to our economies well beyond it's perception as "table fare".

Striped bass are an integral part of New England and the entire Striper coast. They must be protected.

Thank you for your consideration.

#### **4.1**

Tier 1

Option A: Support A1

Option B: Support B1

Option C: Support C1

Tier 2

Option A: Support A2

Option B: Support B1

Option C: Support C1

Tier 3

Option A: Support A2

Option B: Support B2

Tier 4

Support A

4.2

Option B: Support no measure

Option C: Support C1, C2

Option D: Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Option B: Support B1-a

Option C: Support C3

Option D: Support D2

Option E: Support E2

**Sent from my iPhone**

**From:** [Daniel Zazworsky](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] ASMFC Draft Amendment 7 - Comments From an Angler  
**Date:** Friday, April 15, 2022 10:20:30 AM

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To whom it may concern,

My name is Daniel Zazworsky, and I am a passionate Striped Bass angler. For as long as I've been fishing, trips to the Chesapeake and the New England coastline to chase striped bass have been a part of my life. As my life has gone on, I've seen the fishery decline, and inversely my passion for its conservation has increased. I'd very much like for the fishery to adopt a "management for abundance" stance when thinking about the future of the Atlantic striped bass.

**Below you will find my stances on Draft Amendment 7:**

**4.1 Management Triggers**

Tier 1: Fishing Mortality (F) Triggers

Support Sub-option A1 (status quo)

Support Sub-option B1 (status quo)

Support Sub-option C1 (status quo)

Tier 2: Spawning Stock Biomass (SSB) Triggers

Support Sub-option A2

Support Sub-option B1 (status quo)

Support Sub-option C1 (status quo)

Tier 3: Recruitment Triggers

Support Sub-option A2

Support Sub-option B2.

Tier 4: Deferred Management Action

Support Option A (status quo): No Deferred Management Action.

**4.2.2 Measures to Address Recreational Release Mortality**

Support option A. SQ

Support Sub-option C1

Support Sub-option C2.

Support Sub-option D2

4.4 Rebuilding Plan

4.4.1 Recruitment Assumption for Rebuilding Calculation

Support Option B

4.4.2 Rebuilding Plan Framework

Support Option B

4.6.2 Management Program Equivalency (Conservation Equivalency)

Support Sub-option B1-a

Support Sub-option C3

Support Sub-option D2

Support Sub-option E2

Thank you,  
Dan Zazworsky

**From:** [Will Pinkus](#)  
**To:** [Comments](#)  
**Cc:** [Michael Armstrong](#); [Dan Mckiernan](#); [Rep. Sarah K. Peake](#); [Raymond Kane](#); [RICK\\_JACOBSON@FWS.GOV](#); [stripercomments@gmail.com](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 10:18:15 AM

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Hello,

My name is William Pinkus and I have been fishing for striped bass recreationally for 30 years. In this time frame I have witnessed the fluctuation of the stock first hand. Personally I have struggled with the idea of applying for a commercial license because of these fluctuations. As one person, my decisions do not make a significant impact on the stock. We need a more proactive approach to the fishery so that the striped bass stock can be restored. Below are my thoughts.

#### **4.1 management triggers**

-I support option A. This will provide a swift, aggressive response if the triggers are achieved.

#### **4.2.2 measures to address recreational release mortality**

-I support option C1 because I have caught a large quantity of striped bass with injuries from nets. These lethal devices need to be removed.

-I also support option D2 because of my personal experiences. The more fish I catch, the better I become at handling them. With some guidance provided by the state, many incidents of poor handling can be eliminated with education and experience.

#### **4.4.1 recruitment assumption for rebuilding calculation**

-I support option B because the quickest way to rebuild the fishery is through successful spawns in consecutive years. It is important that we do this as soon as possible.

#### **4.4.2 rebuilding plan framework**

-I support option B because we need to adjust if the original plan is not as successful as originally hoped.

#### **4.6.2 management program equivalency**

-I support option B.1-A. The striped bass stock has been statistically overfished for quite some time now. We need to eliminate CE because it is being taken advantage of. Once the fishery returns to a stable state, CE can once again be considered.

Thank you for considering my public comment. There was a significant amount of information to review here, this makes commenting extremely difficult. Additionally the Online video meetings are short and not effective. Hopefully in the future there will be a better chance to be heard.

Tight lines,  
Will Pinkus

**From:** [dkgayer@gmail.com](mailto:dkgayer@gmail.com)  
**To:** [Comments](#)  
**Cc:** [Megan Ware](#)  
**Subject:** [External] Draft amendment 7 comments  
**Date:** Friday, April 15, 2022 10:15:39 AM

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I am a recreational saltwater fisherman based in Southern Maine. I've been an avid surf fisherman targeting striped bass for over 25 years, and I was fortunate to experience early years of great fishing followed by a long decline. I first noticed declining fishing quality in the late 2000s, and it has gone consistently downhill ever since.

With the closure of the cod fishery several years ago, recreational saltwater fishing in Maine is entirely dependent on stripers. Unlike many states to our south, we do not have other alternative species to fall back on. Without stripers, recreational saltwater fishing in Maine would be a pale shadow of what it is now, and most tackle shops, charter boats, and all of the other economic activity related to striper fishing would be gone.

I am writing to urge the ASMFC to take the swiftest and most drastic action possible to conserve striped bass while there is still enough of a population left to allow a recovery without a moratorium and full collapse like what occurred in the 1980s.

As the keystone inshore saltwater species throughout the northeastern US I think stripers must be managed for abundance rather than maximum yield of dead fish on the dock. I say this as someone who loves to eat fish and does eat many fish meals a year, but I choose to harvest species other than stripers. Stripers are worth too much alive to kill for just a few meals. A dead striper on the dock is worth little more than any other fish, but a live one in the water drives the entire recreational fishing economy. I personally would fully support making stripers a recreational only, catch and release only fishery, but I realize that this is not a realistic or achievable goal at the present time. The bottom line for me is that there are many species out there that can provide a good fish dinner, but none other than stripers that can carry the entire recreational saltwater fishing industry on their back.

As to the specific amendment proposals, I support the following:

- 4.1 Tier 1 A1, B1, and C1
- 4.1 Tier 2 A2, B1, and C1
- 4.1 Tier 3 A3, B2
- 4.1 Tier 4 A
- 4.2.2 C1, C2, and D2
- 4.4.1 B
- 4.4.2 B
- 4.6.2 B1-a and C3, D2, E2

Thank you for considering my comments.

Dan Gayer  
Cape Elizabeth, Maine

**From:** [Jesse Martello](#)  
**To:** [Comments](#)  
**Subject:** [External] Stripe bass  
**Date:** Friday, April 15, 2022 10:10:24 AM

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Hello,

I am reaching out to you to voice my concerns about stripe bass management.

As you are aware the charter boat fishing regulations have been shrunken to all time lows. We have continued to educate our customers on the benefits of catch and release but at some point customers want to take fish home to eat.

Charter boats produce the lowest mortality rate, slot management returns large breeding females to stock and lack of managing an abundance of bass will lead to an unbalanced ecosystem.

The charter boat industry needs its own set of regulations at this time to help the industry flourish.

Thank you for your time,  
Captain Jesse Martello

Sent from my iPhone

**From:** [Robert Vossler](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass  
**Date:** Friday, April 15, 2022 10:07:48 AM

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Hello: My name is Robb Vossler and I've fished the Long Island sound my whole life. My life revolves around striped bass. They are in dire straits in my opinion and I place the blame on your ignorance as an administrative body. I support A1, B1 and C1 but truthfully just wish there was a 5 year moratorium.

Sent from my iPhone



**From:** [Jessica Goleski](#)  
**To:** [Comments; stripercomments@gmail.com](#)  
**Cc:** [Matthew Feldman](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 10:07:07 AM

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Dear ASMFC,

>

> My name is Jessica Feldman, a year round resident of Hampton Bays, New York. A small fishing village on the eastern tip of Long Island.

>

> Hampton bays is surrounded by the Atlantic Ocean to the south as well as shinnecock bay to the south, east and west. To the north lies Peconic bay. All of these waterways connected by the shinnecock canal.

>

> This habitat of canals and waterways is absolutely prime territory for striped bass. For close to 8 months of the year the prized striped bass take up residence in this sleepy town and should be plentiful up and down the entire coast.

>

> Striped bass fishing is my favorite hobby and for 30 years of my young life I have truly never had the privilege of witnessing a healthy striped bass fishery. Stories of giant bass, plentiful in years past are now just myths or boat fisherman fodder.

>

> Please restore the striped bass fishery to what it once was and save this mighty American creature from sure extinction. This fish is worth more alive than dead in every state included in the ASMFC. The rebound of the striped bass population would be especially uplifting in these post Covid times we are living in. I urge you to take absolute urgency in this matter and adopt the strictest conservation measures possible to save this incredible creature.

>

> Urgently and respectfully,

>

> Jessica Feldman

>

> Email: [Jessica.goleski@gmail.com](mailto:Jessica.goleski@gmail.com)

> Cell: 631-708-5646

>

**From:** [billy mitchell](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 9:57:31 AM

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Dear ASMFC,

First, I'd like to thank you for your work so far in the long process of rebuilding this precious species of fish, and for the opportunity to be a part of this process. My name is Billy Mitchell, and I'm first and foremost a recreational striper angler. I also own and operate Seven Stripes Fishing, a media company, podcast, and guide service out of Massachusetts.

Striped bass need to be managed for abundance. These are a uniquely American fish--the fruits of which can be enjoyed at all points on the socio-economic spectrum. The collapse of such an iconic and celebrated recreational fish would have devastating effects for, not only the guides, charter captains, tackle shops, and fishing media outlets, but for the fabric of the east coast outdoors lifestyle.

We must make sure the striper survives and thrives for generations to come. Maybe I'm being selfish, but I have two young girls who have already spent a disproportionate amount of time of their young lives on the boat, beach and jetty casting to stripers. We cannot allow striper fishing to become something they look back on in old pictures and think "wow, those were the days." We have a duty to future generations to provide them the, quite frankly, life altering experience of catching their first striper.

For the vast majority, striper fishing isn't a hobby or something we do to destress--it's built into our DNA. The anglers of the East Coast, from the Dad bringing his child to the pier, to the diehard surfcaster, to the tackle shop owner, to the guide, need these fish. For these reasons, I'm recommending the following options in Amendment 7:

4.1 Tier 1:

Sub-option A1

Sub-option B1

Sub-option C1

4.1 Tier 2:

Sub-option A2

Sub-option B1

Sub-option C1

4.1 Tier 3:

Sub-option A2

Sub-option B2

4.1 Tier 4

Option A

4.2.2

Option C

Sub-option C1

Sub-option C2

Option D  
Sub-option D2

4.4

4.4.1

Option B

4.4.2

Option B

4.6.2

Option B

Sub-option b1-a

Option C

Sub-option C3

Option D

Sub-option D2

Option E

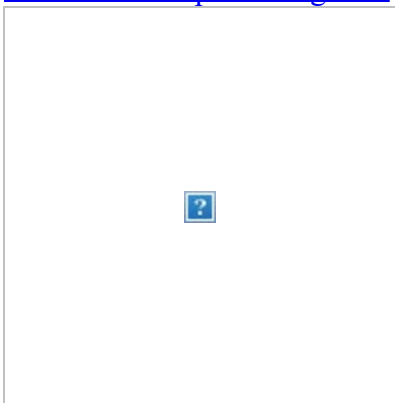
Sub-option E2

Thank you for your time.

Bill

--

[www.sevenstripesfishing.com](http://www.sevenstripesfishing.com)



**From:** [Rich Clark](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 9:45:55 AM

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I understand that the regulation of striped bass fishing is very complicated due to its vast impact on many fronts. The regulations that have been instituted over the last few decades have been positive but more need to be done. I believe a CATCH & RELEASE ONLY should be enforced in all river systems until June 1st. The stripers migrate up the rivers such as the Raratin ,Delaware ,Hudson , etc. to spawn. The more they are left alone during this time the better there chances of spawning.

Thank You

Richard Clark

From: [paulfish.reeltherapy.com](http://paulfish.reeltherapy.com)  
To: [Comments](#)  
Cc: [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [C. LOUIS BASSANO](#); [HEATHER CORBETT](#); [Peter J. Clarke](#); [TOM FOTE](#); [Shawn M. LaTourette](#); [Joe Cimino](#)  
Subject: [External] Amendment 7  
Date: Friday, April 15, 2022 9:45:21 AM

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Dear ASMFC-

I am a small business owner of Reel Therapy Fishing charters, Sandy Hook area of New Jersey for 25 years. My business depends upon the abundance of striped bass so that anglers of all experience levels can catch them consistently.

We lose business over here at Reel Therapy because of our no-kill Striper rule as we feel that these fish are way too important to the future of our sport to kill them off, especially when they are stacked up here during pre-spawn. As to why you don't make these specific areas catch and release only is just plain crazy.

That's a great big, giant what the heck to many of us!

That said we hope anglers and fans will remember that in 2018 the ASMFC declared that "Striped bass are overfished and overfishing is occurring" and has not removed that status. In plain English, that means that the best available science says that the fish are being removed at a faster rate than they can replace themselves and the stock is in trouble. Yet, you, the ASMFC continues to allow harvest.

**What's the point of sending the overfishing red flag up if you don't implement tougher rules to make the stock sustainable???**

Additionally, with the really lame young of year numbers reported out of what used to be the number one spawning stock coming out of the Chesapeake Bay system, the Hudson bass stock is now providing the backbone of the fishery. These fish need to be protected!

Just because we are sitting on the motherload of bass here in the bight doesn't mean that elsewhere on the coast folks are experiencing the same. Our slot fish (28-38) are the same fish that will be spawning during the first week or so in May in the Hudson, Raritan, and Navesink rivers so they deserve catch and release RESPECT.

Right now, these fish are being thrown in the box at a rate faster than ever before.

It's incredibly frustrating to watch this on the water, year after year. To

make matters worse, current situation, we have "Captains" promoting this "ethic" to new anglers while profiting from it all using YouTube videos and social media to promote endless slaughter.

New boats from elsewhere in the state and beyond are now relocating and docking here now for 2 months during the pre-spawn stack up.

Charging \$200 per man x 6 = \$1,200 am and pm \$2,400 per day, add 8 dead "keepers" x two = 16 total DEAD bass per day and that includes one each for Capt. *and* mate.

No care whatsoever given for the future of the striped bass.

There is no sense in these fish being taken, especially how fragile the stocks have been coastwide. We have been here before.

Many other gamefish stocks are in a depleted state adding further pressure on Striped bass. Please do something before we have nothing. Thank you for the opportunity to leave comment. Below are my answers to specific questions asked.

Sincerely,

Paul

Tier 1: Fishing Mortality (F) Triggers

Option A: Timeline to Reduce F to the Target

Preferred Alternative—Sub-option A1 (status quo): Reduce F to a level that is at or below the target within one year.

Option B: F Threshold Triggers

Preferred Alternative—Sub-option B1 (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A

Option C: F Target Triggers

Preferred Alternative—Sub-option C1 (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass

management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A

## Tier 2: Spawning Stock Biomass (SSB) Triggers

### Option A: Deadline to Implement a Rebuilding Plan

#### Preferred Alternative—Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan

The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment

### Option B: SSB Threshold Trigger

Preferred Alternative—Sub-option B1 (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years]

### Option C: SSB Target Trigger

Preferred Alternative—Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years]

## Tier 3: Recruitment Triggers

### Option A: Recruitment Trigger Definition

Preferred Alternative: Sub-Option A2: The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-

2006, which represents a period of high recruitment, for three consecutive years. The high recruitment reference period used for this trigger may be adjusted as recommended by the TC during benchmark stock assessments. This trigger alternative has a moderate sensitivity; it is more sensitive than the status quo but less sensitive than sub-option A3.

Option B: Management Response to Recruitment Trigger Preferred Alternative—Sub-option B2: If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

Tier 4: Deferred Management Action Preferred Alternative—Option A (status quo): No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

#### Effort Controls (Seasonal Closures)

It is clear to me that more needs to be done in certain areas to protect the brood stock, during what we call "pre spawn stack up"

I am in favor of implementing catch and release only in these areas, Barbless hooks on lures, rubber coated nets, catch and release training classes, NO KILL, NO FISH KEPT

Detailed examples of specific area closure:

Draw line from Seguine point NY Southward to Cliffwood beach point NJ>

(west end of Raritan Bay NJ/NY mouth of the Raritan River from March 15 thru May 15)

Sandy Hook Bridge south to include entire estuary of Navesink and



## Shrewsbury Rivers same dates

### Option C. Additional Gear Restrictions

Preferred Alternative—Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass. Barbless hooks on lures, rubber coated nets

### Option D. Outreach and Education

Preferred Alternative—Sub-option D2: It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns

#### 4.4.1 Recruitment Assumption for Rebuilding Calculation

Preferred Alternative: Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis

#### 4.4.2 Rebuilding Plan Framework

Preferred Alternative: Option B: 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 recruitment assumption specified in Amendment 7) 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.

### Option B. Restrict the Use of Conservation Equivalency Based on Stock Status

Preferred Alternative—Sub-option B1-a: CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would

not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals

Preferred Alternative—Sub-option C3: CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30

Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries

Preferred Alternative—Sub-option D2: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%

Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries

Preferred Alternative—Sub-option E2: Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state-specific level.

**Capt. Paul Eidman**  
**732.614.3373**  
**paulfish@reeltherapy.com**

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[www.reeltherapy.com](http://www.reeltherapy.com)  
[www.menhadendefenders.org](http://www.menhadendefenders.org)  
[www.anglersconservationnetwork.org](http://www.anglersconservationnetwork.org)  
[www.anglersforoffshorewind.org](http://www.anglersforoffshorewind.org)



**From:** [Mike Osborne](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 comment  
**Date:** Friday, April 15, 2022 9:42:20 AM

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Hi Emilie,

I am an avid fisherman and fish mostly with my 13 year old son, who is also an avid angler, both fresh and salt water. We fish both from shore and on our boat in the Cape Cod and Southeastern, MA area. I am also a member of a fishing forum and have heard many different views on this issue, many of which I agree with. My "simplest" and most effective solution, not just for striped bass, but the environment in general, would be to stop dragging up our ocean floors. I don't want to pretend I have done the substantial research, but common sense tells me the environmental damage is significant, to all species on this planet. I don't want to harm anyone's livelihood, so I would hope the solution would financially offset those affected. For example, we have relief packages for business's impacted by COVID, we pass bills writing off student loans, ect... I would hope my suggestion would find a solution to benefit all. In regards to the loss of seafood this would create.... maybe more farms in our estuaries... Thank you for reading my email. -Mike

Mike Osborne  
MOLT Electronics Corp.  
45 Main Street  
Unit C-3  
Wareham, MA 02571  
(p) 508-833-8447

**From:** [Surfrat 888](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7 Comments  
**Date:** Friday, April 15, 2022 9:30:19 AM

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To the ASMFC

My name is Robert Lombardi of Westwood, NJ and I am responding to the request for public comments on Amendment Seven for the management of striped bass.

My selections for each proposed regulation are as follows:

#### 4.1 Management Triggers

##### Tier 1-Fishing Mortality Management Triggers

Option A1

Option B1

Option C1

##### Tier 2-Female SSB Management Triggers

Option A2

Option B1

Option C1

##### Tier 3-Recruitment Triggers

Option A3

Option B2

##### Tier 4-Deferred Management Action

Option A

#### 4.2.2 Recreational Release Mortality

Option A

Option C1

Option C2

Option D1

#### 4.4.1 Rebuilding Plan

Option B

#### 4.4.2 Rebuilding Plan Framework

Option B

#### 4.6.2 Management Program Equivalency

Sub-Option B1a

Sub-Option B1c

Sub-Option B2b

Sub-Option C3

Sub-Option D3

Sub-Option E2

Originally from Long Island and now living in New Jersey, I have been fishing since I was a young man in the late 1980's and with my father since the late 1970's. One thing that I have noticed is a constant steady decline of several inshore species. Most recently, the very obvious decline in the striped bass population. This is most noticeable to shore based fishermen who have seen this decline coming for more than 10 years now. Many locations that were once dependable with a steady supply of bass have dried up. A healthy striped bass fishery is important, not just to surf fishermen, but all fishermen and all user groups. We all suffer when the striped bass is mismanaged. There are less trips taken and less money spent on tackle, lodging and food. You have an opportunity to do the right thing for the bass, for all fishermen and women and for future generations of those who love the outdoors. Please let the population recover as quickly as possible and manage striped bass for abundance.

Thank you for this opportunity to comment on this very important issue.

Robert L

**From:** [Nick Bontaites](#)  
**To:** [Comments](#); [Dan Mckiernan](#); [Raymond Kane](#); [Sarah.Peake@mahouse.gov](#); [Sarah Ferrara](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7 comments  
**Date:** Friday, April 15, 2022 9:26:45 AM

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I'm 99% catch and release, even for slot fish. I've been fishing the MA waters for the last 15 years. I'm a catch and release angler, the idea of the slot 28 - 35" was very much appreciated. But needs to be universal down the coast to be successful.

I'm all for smart regulation and enforcing that regulation.

Amendment 7:

Management Trigger

Please take action immediately. - we are not sustaining at this point, we are rebuilding. - I'm in support of ASGA's proposal

Recreational Release Mortality

Sub-option B2-b - agreed, no fishing when fish are spawning. It would help if there was a notification where the fish are spawning, document and close it down during those periods.

Sub-option C1, C2 - NO gaffs, EVER! use a net. ban all lethal devices for removing fish.

Rebuilding Plan

4.4.1 Support for Option B

4.4.2 Support for Option B...take immediate action

Management Program Equivalency

4.6.2 Support for Sub-option B1-a - consistent enforcement

Support for Sub-option C3

Support for Sub-option D2. - CE should NOT be considered, at least 25% uncertainty buffer would be necessary if it goes through

Support for Sub-option E2 - reduce harvest overall

Respectfully,

Nick Bontaites

**From:** [Brian Sittlow](#)  
**To:** [Comments](#)  
**Cc:** [stripcomments@gmail.com](mailto:stripcomments@gmail.com); [Jason E. Mcnamee](#); [DAVID BORDEN](#); [sen-sosnowski@rilin.state.ri-us](mailto:sen-sosnowski@rilin.state.ri-us)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 9:16:52 AM

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ASMFC,

The following is my personal statement regarding the conservation of striped bass and specific views on Amendment.

CAPT Brian Sittlow, US Navy  
48 Watch Hill Road  
Westerly, RI 02891  
716-200-3952

- Active duty Naval Officer for last 28 years.
- Fished for Striped Bass in southern New England waters since 1997.
- Recreational angler, using ONLY barbless, single hooks, 100% flyfishing, 100% catch and release of ALL landed striped bass.
- Average 30-40 days fishing per year.
- Contributed approximately \$90,000 to the local southern New England economy in boats, tackle, fuel, fees and other aspects of activity related to fishing for striped bass.
- NOTICABLE DECLINE in striped bass populations over the last 10 years.
- Committed to striped bass conservation and improvement in overall abundance.
- Past poor striped bass management practiced has lead to Over Fished and Over Fishing status of the stock.

The following are my specific suggestions related to Amendment 7:

I support the positions of the American Saltwater Guides Association. Specifically:

#### **4.1 Management Triggers**

Tier 1: Fishing Mortality (F) Triggers

##### **Option A: Timeline to Reduce F to the Target**

**ASGA Supports Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year.

##### **Option B: F Threshold Triggers**

**ASGA Supports Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at



or below the target within the timeframe selected under Option A.

### **Option C: F Target Triggers**

**ASGA Supports Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

Tier 2: Spawning Stock Biomass (SSB) Triggers

### **Option A: Deadline to Implement a Rebuilding Plan**

**ASGA Supports Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

### **Option B: SSB Threshold Trigger**

**ASGA Supports Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

### **Option C: SSB Target Trigger**

**ASGA Supports Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

Tier 3: Recruitment Triggers

### **Option A: Recruitment Trigger Definition**

**ASGA Supports Sub-option A2:** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

### **Option B: Management Response to Recruitment Trigger**

**ASGA Supports Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

Tier 4: Deferred Management Action

## **ASGA Supports Option A (status quo): No Deferred Management Action.**

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

### **4.2.2 Measures to Address Recreational Release Mortality**

#### **Option C. Additional Gear Restrictions**

**ASGA Supports Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**ASGA Supports Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

#### **Option D. Outreach and Education**

**ASGA Supports Sub-option D2:** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

## **4.4 Rebuilding Plan**

### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

**ASGA Supports Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

### **4.4.2 Rebuilding Plan Framework**

**ASGA Supports Option B:** 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 recruitment assumption specified in Amendment 7) 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.

### **4.6.2 Management Program Equivalency (Conservation Equivalency)**

#### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

**ASGA Supports Sub-option B1-a:** CE programs would not be approved when the

stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

**Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

**ASGA Supports Sub-option C3:** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

**Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

**ASGA Supports Sub-option D2:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

**Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

**ASGA Supports Sub-option E2:** the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Thank you for your consideration to these aspects of conserving striped bass.

Very Respectfully,

CAPT Brian Sittlow, US Navy

**From:** [Ryan Everetts](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] STRIPED BASS AMENDMENT 7 SUBMISSION  
**Date:** Friday, April 15, 2022 9:12:44 AM

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To whom may listen below is my stance on the striped bass amendment No. 7 and the current state of the Striped Bass fishery. I am an avid recreational fisherman fishing Connecticut & Rhode Island waters. I have experienced a major decline in the size and quantity of Striped Bass caught amongst me and my fellow anglers in the past decade.

I have two young daughters (1 & 3 y/o) that I hope someday to share the great joy of fishing for the American Striped Bass. With the power of your position I hope you pass an amendment that will save the Striped Bass from continuous decline and potential extinction.

## **STRIPED BASS AMENDMENT 7**

### **4.1 MANAGEMENT TRIGGERS**

#### **TIER 1: FISHING MORTALITY (F) TRIGGERS**

OPTION A - I SUPPORT SUB-OPTION A1

OPTION B - I SUPPORT SUB-OPTION B1

OPTION C - I SUPPORT SUB-OPTION C1

#### **TIER 2: SPAWNING STOCK (SSB) BIOMASS TRIGGERS**

OPTION A - I SUPPORT SUB-OPTION A2

OPTION B - I SUPPORT SUB-OPTION B1

OPTION C - I SUPPORT SUB-OPTION C1

#### **TIER 3: RECRUITMENT TRIGGERS**

OPTION A - I SUPPORT SUB-OPTION A2

OPTION B - I SUPPORT SUB-OPTION B2

#### **TIER 4: DEFERRED MANAGEMENT PLAN**

OPTION A - I SUPPORT OPTION A

### **4.2.2 MEASURES TO ADDRESS RECREATIONAL RELEASE MORTALITY**

#### **OPTION C: ADDITIONAL GEAR RESTRICTIONS**

OPTION C - I SUPPORT SUB-OPTION C1

OPTION C - I SUPPORT SUB-OPTION C2

#### **OPTION D: OUTREACH AND EDUCATION**

OPTION D - I SUPPORT SUB-OPTION D2

### **4.4 REBUILDING PLAN**

#### **4.4.1 RECRUITMENT ASSUMPTION FOR REBUILDING PLAN**

FRAMEWORK

OPTION B - I SUPPORT OPTION B

4.4.2 REBUILDING PLAN FRAMEWORK

OPTION B - I SUPPORT OPTION B

**4.6.2 MANAGEMENT PROGRAM EQUIVALENCY**

OPTION B: RESTRICT USE OF CONSERVATION EQUIVALENCY (CE)

BASED ON STOCK STATUS

OPTION B - I SUPPORT SUB-OPTION B1-a

OPTION C: PRECISION STANDARDS FOR MRIP ESTIMATES USED ON

CE PROPOSALS

OPTION C - I SUPPORT SUB-OPTION C3

OPTION D: CE UNCERTAINTY BUFFER FOR NON-QUOTA

MANAGED FISHERIES

OPTION D- I SUPPORT SUB-OPTION D2

OPTION E: DEFINITION OF EQUIVALENCY FOR CE PROPOSALS WITH

NON-QUOTA MANAGED FISHERIES

OPTION E - I SUPPORT OPTION E2

PLEASE choose a corrective action to support the population of this exceptional species.

Sincerely,

Ryan Everetts  
45 Dahl Avenue  
Stratford, CT 06614

**From:** [Lancelot Banfield](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped bass  
**Date:** Friday, April 15, 2022 9:11:49 AM

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You should stop letting vocal recreational bass anglers set the fishery goals.

You should focus on non traditional breeding surveys because of the population shift to the north.

The apparent lack of striped bass is false they have just shifted further north and offshore in the warm months and are staying on "summer" fishing spots well into December in Rhode Island.

Please do not let the group that causes the greatest mortality set the management structure. Close recreational bass during pre spawn and when water temperatures are above a safe release temperature.

Thank you,

Lace Banfield.

**From:** [Richard Spies](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [Patrick Keliher](#); [Rep. JAY MCCREIGHT](#); [Sen. Dave Miramant](#); [Stephen Train](#); [Megan Ware](#)  
**Subject:** [External] Amendment 7 Comments  
**Date:** Friday, April 15, 2022 9:10:32 AM

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As a Registered Maine Guide, member of the Maine Professional Guides Association and an avid outdoorsman I take the management of our striped bass fishery very seriously. While Maine has done a decent job of managing the fishery, it's time for other states to tighten restrictions and make adjustments to aid in the long term health of the striped bass fishery. Please accept the following comments and recommendations of where I stand on the amendment.

In regards to Draft Amendment 7, below are the following options I support.

- 4.1 Management Triggers
  - Tier 1: Fishing Mortality (F) Triggers
    - Option A: Timeline to Reduce F to the Target
      - I support Sub-option A1 (status quo): Reduce F to a level that is at or below the target within one year.
    - Option B: F Threshold Triggers
      - I support Sub-option B1 (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.
    - Option C: F Target Triggers
      - I support Sub-option C1 (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.
  - Tier 2: Spawning Stock Biomass (SSB) Triggers
    - Option A: Deadline to Implement a Rebuilding Plan
      - I support Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.
    - Option B: SSB Threshold Trigger
      - I support Sub-option B1 (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].
    - Option C: SSB Target Trigger
      - I support Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].
  - Tier 3: Recruitment Triggers

- Option A: Recruitment Trigger Definition
    - I support Sub-option A2: The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.
  - Option B: Management Response to Recruitment Trigger
    - I support Sub-option B2. If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.
  - Tier 4: Deferred Management Action
    - I support Option A (status quo): No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.
- 4.2.2 Measures to Address Recreational Release Mortality
    - Option B: Effort Controls (Seasonal Closures)
      - I do not support any opens outlined in Option B. There is not enough specific information outlined in this option. Additionally, the data is not there to show that this would have an impact, particularly in Maine where our shorter season, cooler water temperatures, and overall better water conditions are more conducive to the survival of striped bass post-release.
    - Option C: Additional Gear Restrictions
      - I support Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.
      - I support Sub-option C2: Striped bass caught on any unapproved method of taking would be returned to the water immediately without unnecessary injury.
    - Option D: Outreach and Education
      - I support Sub-option D2: It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.
- 4.4 Rebuilding Plan
    - 4.4.1 Recruitment Assumption for Rebuilding Calculation
      - I Support Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point



analysis.

- 4.4.2 Rebuilding Plan Framework
  - I support Option B: 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 recruitment assumption specified in Amendment 7) 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.
  
- 4.6.2 Management Program Equivalency (Conservation Equivalency)
  - Option B: Restrict the Use of Conservation Equivalency (CE) Based on Stock Status
    - I support Sub-option B1-a: CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.
  - Option C: Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals
    - I support Sub-option C3: CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.
  - Option D: Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries
    - I support Sub-option D2: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.
  - Option E: Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries
    - I support Sub-option E2: the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Richard Spies, RMG  
69 Sprague St.  
South Portland, ME 04106  
207-939-3266



**Richard E Spies, PMP**  
Manager, PMO  
121 Free Street, Portland, Maine 04101  
207.842.5681 | [www.divcom.com](http://www.divcom.com)

**From:** [cpalms139@gmail.com](mailto:cpalms139@gmail.com)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment 7  
**Date:** Friday, April 15, 2022 9:07:43 AM

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To the board:

A healthy striped bass fishery means sharing quality time with my family. It is important to me that his tradition of time spend on the water is carried on after I am gone. Healthy fisheries ensure that. What does NOT matter in those traditions is that we bring dead striped bass home. The value is in the experience.

I have read through the options very carefully and I support:

Tier 1: sub option A1, B1, C1

Tier 2 sub option A2, B1, C1

Tier 3: sub option A2, B2

Tier 4: option A

Best,

Chris Palmieri  
106 Atlantic Avenue  
Amagansett, NY 11930

**From:** [Don Kleiner](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 9:07:07 AM

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Emilie Franke, FMP Coordinator,

First thank you for the opportunity to comment on the Draft the proposal is detailed and includes a good deal of important information.

I have been a working guide in Maine for 37 years and have seen many changes in this fishery some good most not so.

We do need to make a serious effort to ensure the improvement of this fishery to a much higher level than we have had in the recent past.

A couple of comments that I would like you to keep in mind as you come to a decision. The relatively high mortality rate from recreational fishing is in my opinion driven by poor fish handling and release methods. Most anglers are not experienced in handling a fish with eh size or strength of a striper of any size. For that reason I do not allow my clients to land their own fish, however most do not hire a guide with a net and some experience. To improve that statistic we need to reach out and educate anglers of every level of experience. This seemingly simply task will take considerable communications skill and effort but I think offers the low hanging fruit in this conversation. Some efforts have been made to date but have fallen far short of what we need. It also seems to me that eliminating the use of a gaff on stripers especially where there is a high percentage of released fish is another simple change that is relatively easy to enact and enforce. Restricting fishing in known spawning areas also makes sense although I think there may be some disagreement about demarcating those areas.

Because our season here is already very short a season closure would cripple my business and is something I cannot support. Especially if the closures would be (as I learned on the seminar) during the busiest part of my season.

Thank you for taking my thoughts into consideration.

Best regards,



Don Kleiner  
Master Maine Guide  
Maine Outdoors  
207-785-4496

[Sign up for some time outdoors](#)

**From:** [Emily Lalime](#)  
**To:** [Comments](#)  
**Subject:** [External] Comments for Amendment 7  
**Date:** Friday, April 15, 2022 8:57:54 AM

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My name is Emily Brewer and I am an avid surfcaster from the state of Connecticut. As a current CT and former NY resident, my husband and i have been fishing for stripers together since we met. This is by far our favorite activity together but we've seen a significant decline in the abundance of our favorite species and we need drastic change to turn things around. Please help to right the ship and get this fishery back on track. For current, and more importantly future anglers, a return to normal abundance of striped bass can bring so much joy and appreciation for the outdoors to so many and we are requesting your help to get us there. Thank you. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Emily Brewer  
Chester, Connecticut  
Email: [lalime13@gmail.com](mailto:lalime13@gmail.com)

Sent from my iPhone

**From:** [Ryan Norell](#)  
**To:** [Comments; stripercomments@gmail.com](#)  
**Subject:** [External] Amendment 7 - Save the Striped Bass  
**Date:** Friday, April 15, 2022 8:53:11 AM

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To whom this may concern,

My name is Ryan Norell and I am a recreation fisherman with a true passion for catching Striped Bass. I spend the majority of time away from my family and loved ones on the water, a place I truly find to be special no matter the geographical location. It has become readily apparent over the past few years that the Striped Bass population is in decline. Between personal experience and the recent studies of spawning striped bass in the Chesapeake, the current data is more than alarming. I am eagerly anticipating the days I can take my daughters out to fish with me, and the thought of Striped Bass not being around for them to catch would be devastating to say the least. We all need to act now to protect these fish for all the future generations of anglers who deserve to have an opportunity to catch these truly amazing game-fish.

I have summarized my comments through supporting the following options in Amendment 7 :

#### 4.1 Management Triggers

##### Tier 1

- Option A - Support Sub-Option A1
- Option B - Support Sub-Option B1
- Option C - Support Sub-Option C1

##### Tier 2

- Option A - Support Sub-Option A2
- Option B - Support Sub-Option B1
- Option C - Support Sub-Option C1

##### Tier 3

- Option A - Support Sub-Option A2
- Option B - Support Sub-Option B2

##### Tier 4

- Option A - Support Option A

#### 4.2.2 Measures to Address Recreation Release Mortality

- Option C - Support Sub-Option C1
- Option C - Support Sub-Option C2
- Option D - Support Sub-Option D2

#### 4.4 Rebuilding Plan

##### 4.4.1 Recruitment Assumption for Rebuilding Calculation

- Option B - Support Option B

##### 4.4.2 Rebuilding Plan Framework

- Option B - Support Option B

4.6.2 Management Program Equivalency

- Option B - Support Sub-Option B1-a
- Option C - Support Sub-Option C3
- Option D - Support Sub-Option D2
- Option E - Support Sub-Option E2

Thank you,

Ryan Norell

**From:** [Rev AztecaNYC](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 8:44:27 AM

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**I am writing to comment on Draft Amendment 7. I am a relatively new striper fisherman but a long time NYC resident. When I grew up fishing in the 80s and early 90s it felt like there were no Striped Bass left. I don't want to go back to that. It is time to manage the fisheries for abundance. It's good for the ecosystem, fishermen and businesses. These are my choices. Let's do the right thing.**

**Tier 1 Option A: Sub-option A1 (status quo)**  
**Tier 1 Option B: Sub-option B1 (status quo)**  
**Tier 1 Option C: Sub-option C1 (status quo)**  
**Tier 2 Option A: Sub-option A2**  
**Tier 2 Option B: Sub-option B1 (status quo)**  
**Tier 2 Option C: Sub-option C1 (status quo)**  
**Tier 3 Option A: Sub-option A2**  
**Tier 3 Option B: Sub-option B2**  
**Tier 4 Option A: (status quo) *NO DELAY!***  
**4.2.2 Sub-option C1, Sub-option C2, Sub-option D2**  
**4.4.1 Option B**  
**4.4.2 Option B:**  
**4.6.2 Option B: Sub-option B1-a.**  
**4.6.2 Option C: Sub-option C3**  
**4.6.2 Option D: Sub-option D2**  
**4.6.2 Option E: Sub-option E2**

Sent from my iPhone



**From:** [Peter](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Friday, April 15, 2022 8:39:03 AM

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To the ASMFC

My name is Peter Walsifer from New Jersey and I am responding to the request for public comments on Amendment Seven for the management of striped bass.

Here are my choices for each proposed regulation.

4.1

Tier 1

A1

B1

C1

Tier 2

A2

B1

C1

Tier 3

A2

B2

Tier 4

A

4.2

B- None

C1, C2

D2

4.4.1

B

4.4.2

B

4.6.2

B1-a

C3

D2

E2

I have been lucky enough to grow up in Belmar NJ which gave me access to the ocean as a kid. I spent my youth on a beach cruiser with a pole holder pedaling around ocean ave in monmouth county chancing striped bass. since catching my first fish in 1997 i've seen the fishery have ups and downs. the current down situation we face is dire and needs to be addressed. I've recently become a father for the first time to a beautiful baby boy. My dream is one day he and i can chase bass together in the same places i did as a child. Please enact these changes so that dream can live on and eventually become a reality. i'd rather deal with restrictive rules now to ensure this fishery can bounce back and thrive as it once did.

Please stand up for the striped bass, and end overfishing as quickly as possible.  
Please manage stripers for abundance, and not yield!

Thank you for your time,

Peter Walsifer  
Belmar NJ

**From:** [Peter Caravousanos](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 8:38:24 AM

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I am an angler for over 40 years, from Long Island, NY. Striped bass like other wildlife needs to be protected by human beings, our ability to manipulate the environment and what gets to live or die need strict management due to human greed.

I never understood the size limits for stripers they always seemed arbitrary normally an expert in this area but I could give you my common sense understanding and recommendation.

1. Striped bass should be given unfettered breeding opportunities, Even if that limits the length of the fishing season for them.
2. Very large striped bass and very small striped bass should always be protected and I rely on the experts to determine the size limits.
3. The truth about the health concerns in consuming striped bass needs to be publicly obvious to everyone including purchasers at the Fish market.
4. Strict enforcement and conservation practices of commercial fisherman is imperative in protecting all fish species and our oceans, and planet.

Our planet is a delicately balanced ecosystem if we break the balance consequences could be dire it all starts with every single fish and how we catch them.

Thank you!

Sincerely;  
Peter Caravousanos  
917-797-2821

**From:** [Jonathan Krahl](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Friday, April 15, 2022 8:34:08 AM

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To the ASMFC

My name is Jon Krahl from New Hampshire and I am responding to the request for public comments on Amendment Seven for the management of striped bass. The protection and proper management of striped bass is critical. As you know, these fish were almost lost years ago and a serious and committed effort was made to bring them back. This can be done again, and needs to be done. We have seen examples elsewhere (redfish and snook) where proper action and effective measures being taken have drastically altered the population. Please do what is right and help the striped bass species for generations to come.

Here are my choices for each proposed regulation.

4.1  
Tier 1  
A1  
B1  
C1  
Tier 2  
A2  
B1  
C1  
Tier 3  
A2  
B2  
Tier 4  
A  
4.2  
B- None  
C1, C2  
D2  
4.4.1  
B  
4.4.2  
B  
4.6.2  
B1-a  
C3  
D2  
E2

We appreciate the opportunity for you to allow us to submit our comments. As you are aware, the management of Striped Bass is extremely important to so many of us. We are asking you to please stand up for the striped bass, and end overfishing as quickly as possible. Please manage stripers for abundance, and not yield!

Thank you  
Jon Krahl

--

**Jonathan Krahl**  
**Cell: (860) 416 - 2283**

**From:** [Jane Simpson](#)  
**To:** [Comments](#)  
**Subject:** [External] Attn: Emilie Frank  
**Date:** Friday, April 15, 2022 8:23:48 AM

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*I strongly support a slot limit for Striped Bass but believe that the current 28" minimum does not give enough fish the needed spawning time. A 28" minimum only allows 3 years of spawning time while a 31" minimum would allow 4 - 5 years for a Bass to spawn before possibly being killed. I support a 31" - 35" slot limit. This slot limit should be enforced uniformly all along the Atlantic Coast. To allow different regulations on a migrating fish is ludicrous.*

**From:** [Germain Cloutier](#)  
**To:** [Comments](#)  
**Cc:** [Stripercomments@gmail.com](mailto:Stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 8:23:38 AM

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Hello ASMFC,

My name is Germain Cloutier. I am an avid fisherman that fishes the entire east coast. I have submitted a written letter that was mailed several weeks ago but I wanted to just make a few last comments just in case my letter never made it on this Final day for public input.

I believe that the Board really needs to consider adding cuts to harvest both recreational and commercial as well as trying to reduce the release mortality. It will be impossible to try and fix the fishery by just trying to fix Estimated release mortality. It won't happen. As far as the seasonal closures, protecting the fish while they spawn would be a great thing to consider, but again that would have to be across all recreational and commercial interests to be effective.

Conservation Equivalency needs to be gone, at this time with stocks overfished and overfishing is occurring there is Zero place for CE right now, and that should be across all States!

I attended all the Webinars, which were very well done. The polling was a great way to get input and I hope that is used in the decision making process. Draft Amendment 7 is a large and complex document that the public had some difficulties with, I hope that form letter will be considered and counted just the same as individual since that was what was said at some of the Webinar meetings.

Thank you,  
Germain Cloutier  
[Stripedbassking@yahoo.com](mailto:Stripedbassking@yahoo.com)

[Sent from Yahoo Mail for iPhone](#)

**From:** [Maged Ibrahim](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 Public Comment - Maged Ibrahim  
**Date:** Friday, April 15, 2022 8:21:42 AM

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To Whom it May Concern,

I am a multi state recreational angler that has been in pursuit of striped bass since 1999. In my pursuit of striped bass I've encountered a number of passionate anglers who've since become some of my closest friends. We collectively fish the NE coast stimulating the economy and our passion of fishing. It's apparent that the striped bass population are in decline. I support amendment 7 as follows:

Tier 1  
Option A  
Option B  
Option C

Best regards,  
Maged Ibrahim



**From:** [Alex Ford](#)  
**To:** [Comments](#)  
**Cc:** [Dan Mckiernan](#); [Michael Armstrong](#); [Rep. Sarah K. Peake](#); [Raymond Kane](#); [LOWELL WHITNEY](#)  
**Subject:** [External] Amendment 7 Comment  
**Date:** Friday, April 15, 2022 8:13:23 AM

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April 15th, 2022

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

Dear Ms. Franke and members of the ASMFC Striped Bass Advisory Council,

Passionate striped bass recreational fisherman and Massachusetts resident here chiming in for further protection of striped bass stocks up and down the East Coast. I remember catching big bass when I was a kid, and can only hope to have those days again for myself and my children before it's too late. I believe my comments below reflect that.

Thanks

Alex Ford

Please find my comment on the Striped Bass Draft Amendment 7 below.

#### 4.1 Management Triggers

##### Tier 1

- Sub-Option A1
- Sub-Option B1
- Sub-Option C1

##### Tier 2

- Sub-Option A2
- Sub-Option B1
- Sub-Option C1

##### Tier 3

- Sub-Option A2
- Sub-Option B2

##### Tier 4

- Option A

#### 4.2.2 Measures to Address Recreational Release Mortality

##### Option C

- Sub-Option C1
- Sub Option C2

##### Option D

- Sub Option D2

#### 4.4 Rebuilding Plan

##### 4.4.1 Recruitment Assumption for Rebuilding Calculation

##### Option B

##### 4.4.2 Rebuilding Plan Framework

Option B  
4.6.2 Management Program Equivalency

Option B  
- Sub-Option B1-a

Option C  
- Sub-Option C3

Option D  
- Sub-Option D2

Option E  
- Sub-Option E2

--

Alex Ford  
908.642.8930  
[FordHamilton.com](http://FordHamilton.com)

**From:** [Evan Laporte](#)  
**To:** [Comments; stripercomments@gmail.com](#)  
**Subject:** [External] Amendment 7 - ASMFC Striper Management Public Comment  
**Date:** Friday, April 15, 2022 8:02:59 AM

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Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board (Board):

My name is Evan LaPorte, father of two daughters, husband, fine artist, carpenter, obsessive saltwater angler and a lifelong New Englander. We live in South Dartmouth but I grew up in central MA chasing brooktrout. I am writing to express my personal views and concerns regarding the current status of the striped bass population, management policies, and prospective management.

Both my Grandfathers fished and hunted and were conservation minded. I remember fiery monologues from Grandpa Charlie on vacation in Wells ME regarding mismanagement and bad practices as well as the degrading environment. This was during the moratorium and dwindling fish stocks. Forage like mackerell had become scarce and the predators all but gone. His daughter, my mother, is a retired Science teacher whose passion in life sciences and biology kept me turning over rocks and traveling further upstream and down the beach in search of natural wonders. I am still on that journey and do my best to kindle that fire in my children and someday with their children. I hope my voice in this public comment helps in protecting this resource.

**Tier 1: Fishing Mortality (F) Triggers:** To me, management makes the most sense when science-based data is applied to the policy principles and adoption. With the target of longevity for both recreational and commercial anglers, I see it best to adjust management levels based on the mortality targets and spawning stock biomass targets; these should be considered as dependent variables when fluctuations occur. i.e. If mortality rates increase for two consecutive years and the spawning stock biomass falls below target in either year, then management must be amended to reduce the mortality rate overall.

**Tier 2: Spawning Stock Biomass (SSB) Triggers:** I believe this should be constantly managed as reportable data indicates that SSB falls below the threshold. Additionally, a rebuilding stock program should be implemented as this is a federal requirement via Magnuson-Stevens Act. Similar rebuilding programs in the Texas Gulf were implemented to rebuild the Red Drum fishery; one that I personally love and hold dear, too. Lastly, I believe this should be managed similarly to my comments in Tier 1 on a relationship basis with fishing mortality thresholds and biomass reproduction.

Please consider using science-based data and logic in all regards and use mortality-biomass reproduction as dependent variables. If SSB decreases below threshold indicating a poor breeding season, then mortality rates must be adjusted; this is not punitive to commercial, but should be seen as supportive to provide for longevity of keep.

**Efforts Controls (seasonal closures):** I view any two-week period of seasonal closures as a band-aid to a larger problem. Recreational angling is 90% catch-and-release, and this would be inappropriately punitive to the community. I would, however, support a two-week seasonal closure on catch-and-keep. This would allow for angling, but preserve stock. Additionally, law enforcement does what they can to police the regulations, however with their personal low

resources, this is not an enforceable solution.

**Additional Gear Restrictions:** I support the prohibition of recreational anglers to not use lethal devices in an effort to pull the striper from the water or assist in releasing. Additionally, I would promote and support that nets must be of material that protects the fish (no rope, string nets).

#### **4.4 Rebuilding Plan**

##### **4.4.1 Recruitment Assumption for Rebuilding Calculation - Prefer option B**

##### **4.4.2 Rebuilding Plan Framework - Prefer option B**

**4.6.2 Management Program Equivalency** - I do not support Conservation Equivalency (CE) programs. I think this is an illogical way to support the longevity of the biomass for the benefit of both recreational and commercial anglers. I believe that it is fair and equitable for individual states to bear the proportionate burden when a reduction in mortality is necessary. This hopefully, will result in a future coastwide target.

Thank you for taking the time to read my commentary on the subject. I greatly appreciate the efforts you all are making, and I do hope that we can preserve the striped bass population for all through logic, science, and data in order to protect the striper population for generations to come.

Cheers!

Evan

**From:** [Kevin LaCroix](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 7:53:03 AM

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Hello,

I have spent my whole life fishing for Striped Bass in very ethical ways. I have bonded with friends old and new through their arrival here on Cape Cod and it's become something very sentimental to me and many.

Please do anything you can to restore the population and make it prosperous for the future generations. In my opinion, making Striped Bass a GAME FISH will bring a lot of tourism and revenue to various areas and industries. It would be very similar to the way guides and charters have gained business in Florida.

I repeat, letting the population slip to far without any strict regulations will make the east coast a very dark and dismal place. We must protect the one things that gets us through the winter!!

Sincerely,  
Kevin LaCroix

**From:** [Mollie Wilkie](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Striped Bass Amendment 7 Comments  
**Date:** Friday, April 15, 2022 7:49:30 AM

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> My name is Mollie Wilkie. I live in New York and fish primarily for Striped Bass with my family. Please take as strong as measures as possible to protect this fishery and stop overfishing.

>

> Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

>

> 4.1

> TIER 1:

> Support A1

> Support B1

> Support C1

>

> TIER 2:

> Support A2

> Support B1

> Support C1

>

> TIER 3:

> Support A2

> Support B2

>

> TIER 4:

> Support A

>

> 4.2

> None

> Support C1, C2

> Support D2

>

> 4.4.1

> Support B

>

> 4.4.2

> Support B

>

> 4.6.2

> Support B1-a

> Support C3

> Support D2

> Support E2

>

>

> Thank you for the opportunity to comment, and I hope that my voice will be heard.

>

> Sincerely,

>

> Mollie Wilkie

> Brooklyn, New York

> Email: [mswilkie1@gmail.com](mailto:mwilkie1@gmail.com)

Sent from my iPhone

**From:** [Jp Hatch](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped bass regulations  
**Date:** Friday, April 15, 2022 7:43:09 AM

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Striped bass are worth so much more alive than dead. Please make some drastic changes to the policy in favor of conservation so I can take my kids fishing in 10 years and they can take theirs in 30.



**From:** [Mallard Charters](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 7:31:03 AM

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I am Captain Troy Ruth of Mallard Charters. I would like to say we try to look after lively hood and take of our fish .We report all our catch and release fish. As of now the charter boat association gives DNR more information than they ever had. So we do kill as many fish as first thought So I think there should be no more closure. I think you look into catch and release in spring months when females are the most vulnerable. Look into menhaden fishing in the lower bay cuttings the food supply for the upper bay .Thank you.

**From:** [shawn gibson](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 7:25:28 AM

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Hello,

I am a charter captain on the Chesapeake Bay and have fished the Maryland mid-bay area in the charter industry since 1993. I've seen the lows, the highs and the current decline in abundance of striped bass in our area and my opinion is formed based on my experience and not emotion.

Simply put, Recreational effort has increased exponentially over the past 25 years and we have managed the resource to allow maximum harvest. The regulation changes post 2015 were a disaster, increasing the minimum length to 20" resulted in increased release mortality and we have continued to allow this to happen every summer since then. We are not allowing the juvenile population of stripers the opportunity to grow. Even during a recreational closure, commercial fisherman can harvest striped bass. There is little to no policing of the commercial fleet that can easily cull fish to insure maximum price for larger fish.

We need to take pressure off the Chesapeake Bay nursery during summer months. We are wasting a resource by allowing the ridiculous amount of dead released striped bass to float belly up during the summer. Stop all harvest and targeting during warm water months (commercially and recreationally).

Stop the Virginia spring intercept fishery. Targeting spawning stripers headed to spawning grounds should be illegal and no commercial fishery should be allowed.

Please do not allow commercial quota to be transferred between states. Commercial quota is already difficult to accurately and truthfully report. 10lb fish checked as 5lb fish can easily double the commercial harvest in a single year. Don't allow this transfer and hold each state accountable for accurate commercial harvest reporting.

Shawn Gibson

Wound Tight Sportfishing LLC  
Miss Lizzy Fishing Charters LLC  
410-610-6283

**From:** [LeslieK](#)  
**To:** [Comments](#)  
**Subject:** [External] Protect Striped Striped Bass!  
**Date:** Friday, April 15, 2022 7:15:46 AM

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Emilie Franke,

I am a surf casting fisherwoman of Cape Cod. I do not want to see the decline of Striped Bass. I would like to see the slot size increased so the bass can spawn for several years. I think one fish per person is enough. I think the CC Canal should be catch and release only.. Circle hooks with bait , yes!

Protect Striped Bass!

Thank You!

[Leslie Kalinowski](#)

**From:** [Aleca Hughes McPherson](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Draft Amendment 7 Comment  
**Date:** Friday, April 15, 2022 7:14:12 AM

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Dear Emily and the members of the ASMFC Atlantic Striped Bass Management Board,

I would like to thank you for the opportunity to comment on Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass.

I strongly urge the Board to take decisive action to rebuild the striped bass fishery and establish management reforms that position the Atlantic striped bass stock for long-term abundance and stability. The need for action is critical given that spawning stock biomass is at a 25-year low and that the three most recent young-of-year indices in upper Chesapeake Bay are among the lowest on record. While the draft amendment includes much-needed changes to improve the outlook for striped bass, it also includes potential pitfalls, particularly on the topic of management triggers, that raise concern. In the paragraphs below, I have outlined my positions on each of the decision points for the four major issues contained in the draft amendment.

The Massachusetts fishery has been of generational importance to my family and it is our hope that it continues to be in the generations ahead. It is my desire that the Board recognizes the value of the fish when it is thriving and abundant in our waters. As you know well, the importance of this species cannot be overstated.

There are tens of thousands of anglers who share the same opinion as me. Striped Bass must be restored to abundance and we will no longer tolerate their failure. I ask the Board to not be misled by the few outspoken critics and misguided people who oppose Striped Bass conservation measures. Striped Bass are the most important fish in our waters and need to be treated and managed with the utmost respect. I feel that it is our duty to the environment and future generations.

Striped bass are at the core of the East Coast's recreational fishing community and economy, and all eyes are on the Striped Bass Board as you decide the fate of the ASMFC's flagship species. Please take this opportunity to position this treasured species for recovery and long-term success.

#### **4.1 Management Triggers**

##### **TIER 1 OPTIONS: Fishing Mortality (F) Triggers**

- **Option A: Timeline to Reduce F to the Target**  
**I support Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year. I believe that wherever possible the board should move as quickly as possible to reduce fishing mortality. Sub-option A1 offers the shortest timeframe to get it back below the target.
- **Option B: F Threshold Triggers**  
**I support Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

- **Option C: F Target Triggers**  
**I support Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

## **TIER 2 OPTIONS: Female Spawning Stock Biomass (SSB) Management Triggers**

- **Option A: Deadline to Implement a Rebuilding Plan**  
**I support Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment.
- **Option B: SSB Threshold Trigger**  
**I support Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].
- **Option C: SSB Target Trigger**  
**I support Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

## **TIER 3 OPTIONS: Recruitment Triggers**

- **Option A: Recruitment Trigger Definition**  
**I support Sub-option A3:** The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model (NY, NJ, MD, VA) shows an index value that is below the median of all values in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years. The high recruitment reference period used for this trigger may be adjusted as recommended by the TC during benchmark stock assessments. This trigger alternative has a higher sensitivity than both the status quo trigger and sub-option A2 (Figure 1). This trigger alternative would have tripped six times since 2003: NY in 2006; MD in 2008; MD in 2009; MD and VA in 2010; NY in 2013; MD in 2014 (Table 2). The status quo (current trigger) has only been tripped once in the time period between 2003-2020, clearly it is not sensitive enough based on where the stock is currently at. A2 would have tripped the trigger 3 times in that same time period. A3, while classified as a “high sensitivity trigger”, would have tripped the trigger 6 times in that same time frame. As with the other options supported, I believe the board needs to operate with more caution moving forward, being aware of and addressing years of low recruitment ASAP.
- **Option B: Management Response to Recruitment Trigger**

**I support Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year. In the past, the board has failed to adjust F to account for both good and bad year classes (recruitment). With several recent years of poor year classes I ask the board to be more responsive to these shifts. B2 puts an interim F target adjustment in place if the recruitment trigger is tripped.

#### **TIER 4 OPTIONS: Deferred Management Action**

- **I support Option A (status quo):** No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger. I cannot support any options which allow the board to defer action if a management trigger is tripped. Options B-F all allow for deferred action by the board in the event of a management trigger. Given where the stock is currently at, overfished with overfishing occurring, the “Board’s concern about the frequent need for management action due to triggers tripping with each stock assessment update or benchmark” is quite frankly, absurd. Stock assessments are typically conducted every 2 years (COVID delayed the last one) and benchmark assessments every 5 years. If the board needs to convene and take action more frequently to maintain a healthy stock then so be it.

#### **4.2 Recreational Fishery Management Measures**

- **Option B: Effort Controls (Seasonal Closures)**  
**I support Sub-option B2.** Spawning Area Closures: The Board can select either or both of the following sub-options B2-a and B2-b. Multiple states currently have spawning closures in place with closure boundaries defined by those states. Existing spawning closures would be applied toward meeting the requirements of the selected option(s).<sup>15</sup> Spawning area closures during the spawning season could contribute to stock rebuilding by eliminating harvest and/or reducing releases of spawning and pre-spawn fish. Reducing releases during this time is particularly important to reduce stress and injury to fish as they move into lower salinity spawning areas. If new information on the timing of striped bass spawning is available in the future, the TC would conduct a review of that research and recommend changes to the timing of spawning closures if needed. If this option is selected, CE would not be permitted.
- **I support Sub-option B2-b.** No-Targeting Spawning Closure Required: All recreational targeting of striped bass would be prohibited for a minimum two-week period on all spawning grounds (not necessarily the entire spawning area) during Wave 2 (March-April) or Wave 3 (May-June), as determined by states to align with peak spawning. States will determine the boundaries of spawning ground closures. Closures prohibiting recreational targeting on spawning grounds have already been implemented in Maine (Kennebec River), New Jersey (Delaware River), and Maryland (Chesapeake Bay) during part of Wave 2 and/or Wave 3 (Figure 4).

This is an important one! And while this is a complex section of Amendment 7 I

believe it is vital to the recovery of the SSB and stock as a whole. Sub-option b2-a would prohibit harvest but allow for catch and release, b2-b would be a no targeting closure and would provide the best protection for the SSB while they spawn. The option is somewhat open ended with the language calling for a “minimum two-week period,” I would like to see it closer to a four or six week period in order to see the best results and gain the most protection for the SSB. Many other species benefit from shortened seasons or spawning closures and Striped Bass should as well. Considering the stock is currently overfished with overfishing occurring, the least we can do is allow for uninterrupted spawning. The argument that Striped Bass would be a bycatch while fishing for Bluefish or other species is mostly null as Bluefish do not show up in great numbers until after this timeframe. The uncertainty regarding these options surround the definition of the spawning areas and the possibility that states may need to work together to provide the most amount of protection for the SSB as they stage ahead of the spawn and then move up into the river to do so. The best example of this is the case of the Hudson River where fish stage in Raritan Bay, New Jersey before ascending the Hudson River to spawn in NY. In a best case scenario this targeting closure would not only protect the spawning grounds but also the areas in which the SSB congregates prior to spawning, they go hand in hand. Despite these uncertainties I support these options with the hope that the TC and board will work together to develop these areas. Overall these options err on the side of caution but with the Striped Bass SSB and stock as a whole being in such a dire situation, I believe any gain, no matter how big is worth the risk involved.

- **Option C: Additional Gear Restrictions**

**I support Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**I support Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury. These options are a no brainer. Let’s prevent the use of gaffs for removing fish from the water in the event that they would need to be released as slot limits require more fish to be released. C2 would require non circle hooked fish (J-hook when fishing for other species) to be returned to the water as soon as possible and with careful handling. Both of these measures combat recreational release mortality which has been determined to have a large effect on F.

- **Option D: Outreach and Education**

**I support Sub-option D1:** States would be required to promote best striped bass handling and release practices by developing public education and outreach campaigns. States must provide updates on public education and outreach efforts in annual state compliance reports. States collect license fees and I believe some of that money should be spent on angler education and more specifically catch and release best practices. Option D2 only recommends that “states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns.” I believe that this should not just be a recommendation but a requirement. Angler education is an essential method to help curb recreational release mortality and ultimately help rebuild the stock to abundance.

#### **4.4 REBUILDING PLAN**

#### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

- **I support Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis. As I have mentioned, young of year over the past 3 years has been well below average. Combine this with the fact that Addendum 6 only addressed mortality and not rebuilding the stock and now we are in a terrible spot. The writing has been on the wall for years, if you were on the water it was clear that the stock was in trouble. Option B bases the rebuild of the SSB on the ‘low recruitment regime assumption,’ more in line with the poor year classes previously mentioned. It would likely achieve a lower level of removals and require more restrictive management measures.

#### **4.4.2 Rebuilding Plan Framework**

- **I support Option B:** 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 recruitment assumption specified in Amendment 7) 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. A new stock assessment will be published in October 2022 and depending on the outcome it may have a massive impact on the measures being put in place by Amendment 7. It is an unfortunate situation and likely could have been avoided if the board took action sooner but it is a concession we should be willing to make to prevent a further delay in developing and putting into action an addendum to Amendment 7. As noted it appears the board is willing to allow some sort of public involvement in the process. “Under this option, public comment could be provided during Board meetings per the Commission’s guidelines for public comment at Board meetings, and/or public comment could be provided in writing to the Board per the Commission’s timeline for submission of written public comments prior to Board meetings.”

### **4.6 ALTERNATIVE STATE MANAGEMENT REGIMES**

#### **4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option B. Restrict the Use of Conservation Equivalency Based on Stock Status**

- **I support Sub-option B1:** Restrictions: CE programs would not be approved when Sub-option B1-a: the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level. While I was hoping to see conservation equivalency completely removed from the management process, that is not an option within Amendment 7. The TC has stated that the implementation of CE in the management process is unquantifiable and will likely cloud the regulations put in place by states to reach the overall reductions necessary. Option B, sub-option B1 provides the most limitations to the use of CE by states, some of whom have taken advantage of it. The stock needs to be managed for abundance and therefore I'd like to let the Commission know that CE has no place in a stock that is overfished with overfishing occurring. If you only choose to speak on or select a few options from A7, this should certainly be one of them.



#### **4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

- **I support Sub-option C3:** CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30. This is the most conservative option available as stated in Amendment 7 “NMFS warns that “[MRIP] Estimates should be viewed with increasing caution as PSEs increase beyond 30. Large PSEs—those above 50— indicate high variability around the estimate and therefore low precision.”. I want to make sure the CE is only accessible if tightest estimate and least amount of risk.

#### **4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

- **I supports Sub-option D3:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 50%. An uncertainty buffer refers to the previously mentioned unquantifiable results of states putting CE in place as pointed out by the TC. What this means in simple terms is, if a state wants to make use of CE they will need to plan for a buffer to account for possible overages of F. In other words it could be thought of as a tax for using CE. This will hopefully discourage states from using CE in the first place. I would like to see the biggest buffer possible (50%) put in place to dissuade states from trying to use CE. If they do opt to use it the 50% buffer would hopefully counteract the potential overages in F.

#### **4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

- **I support Sub-option E2:** Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state-specific level. This would essentially undo the terribly unfortunate series of events that transpired during the addendum 6 process. New Jersey felt that the coastwide 18.5% reduction based on harvest was unfair as it translated to a larger reduction for them due to the complication of the slot limit. The board sided with New Jersey who then ultimately failed to meet its goals and in the end took no reduction. Therefore, I must select option E2.

Sincerely,  
Aleca Hughes McPherson

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Aleca Hughes McPherson  
(508) 463-6839  
[aleca.hughes@gmail.com](mailto:aleca.hughes@gmail.com)

**From:** [Leo Schmidt](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped bass management  
**Date:** Friday, April 15, 2022 7:07:27 AM

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*I am a recreational surfcaster from Massachusetts, fishing primarily for Striped Bass in the waters of Cape Cod Bay and Boston harbor. I am alarmed by the decline of Striped Bass stocks and the lack of recent overall spawning success.*

*I am also sickened by the selfish, disgusting behavior of those people who abuse this resource by poaching and practicing what is known as "high grading". People who intentionally take fish that are too small, take too many, or toss a dead fish into the water so they can keep a larger one. To see the white bellies of several dead 20 pound bass floating in the current of the Cape Cod Canal pushes one to a point beyond anger.*

*I strongly support a slot limit for Striped Bass but believe that the current 28" minimum does not give enough fish the needed spawning time. A 28" minimum only allows 3 years of spawning time while a 31" minimum would allow 4 - 5 years for a Bass to spawn before possibly being killed. I support a 31" - 35" slot limit. This slot limit should be enforced uniformly all along the Atlantic Coast. To allow different regulations on a migrating fish is ludicrous.*

*As a Massachusetts and Cape Cod Canal Fisherman, I support the present regulation of no commercial fishing in the Canal. I also believe that the Cape Cod Canal should be catch and release only. The fish are just too vulnerable in that stretch of water, particularly the larger fish.*

*As far as commercial regulations go, I understand allowing commercial fishermen to take a greater number of fish than recreational fishermen. What I don't understand is allowing them to take large numbers of the larger fish. This is absolutely counter productive to the goal of improving spawning success of the Striped Bass bio mass. The larger fish need to be saved, not killed. This seems like a sellout by regulators to me.*

*I support the use of circle hooks when bait fishing and I started using them several years ago to avoid the gut hooking of fish that happens when using J hooks.*

*I strongly support making Striped Bass a sport fish that can be taken by rod and reel only. I am haunted by the massive hauls of large bass that I see as a result of shore based netting from some areas of the Atlantic Coast. Certain historical methods of fishing, such as the fish weirs we see in Cape Cod Bay, or the nets off the West Wall in Rhode Island, are glamorized and declared a never ending right for those who now take more than their share at a time when the resource can not withstand that amount of reduction. I have seen this pattern repeated multiple times in the fishing industry. The resource is overfished by those who are in it for the quick buck without any regard for sustaining the fishery. Fishermen don't have a perpetual right to fish a certain way just because their great, great Grampa did that 100 years ago.*

*I also can not understand why the Striped Bass are allowed to be hammered all winter long as they hold off the mid Atlantic Coast. They are exceedingly vulnerable. We have all seen the photo of the young woman sitting on top of the pile of huge Striped Bass as the charter boat makes it's way back to port. The excess is disgusting!*

*I support the restriction of fishing for Striped Bass in spawning areas during the time of year they are spawning. It makes no sense to cause stress or eliminate large Bass full of eggs before they have a chance to spawn.*

*Thank you for your attention,*

Sent from my iPhone

**From:** [Tim Harris](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 6:52:09 AM

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Striped bass are overfished and under fed.

Without ending or severely limiting the factory fishing of menhaden, a staple food for striped bass (as well as grey trout, cobia and whales) there is no chance of a rebound.

Further, menhaden are filter feeders that clean the bay, further benefiting the bass.

We are spending billions to address water quality in the bay while we allow a foreign- owned company, Omega, to empty the bay of an animal that cleans the water while sustaining striped bass.

Please stop this tragedy of the commons.

Place a moratorium on menhaden fishing. Let VIMS study the fishery. And watch the stripers rebound.

What do we have to lose, other than Omega money that is corrupting the Commonwealth?

Nothing.

Tim Harris  
CEO  
Tienda Inc.  
757.741.4016

**From:** [McKenzie, Matthew](#)  
**To:** [Comments](#)  
**Subject:** [External] ASMFC Striped Bass Amendment 7 Comments  
**Date:** Friday, April 15, 2022 6:42:58 AM

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Dear ASMFC,

I would like to submit my comments on Amendment 7 to the Striped Bass management plan. I served on the NEFMC for nine years, and I have fished on striped bass for the last 20 years. I remember the 1980s when there were none to be had, and I remember how remarkable it was when we brought them back.

Once again, we face a situation requiring long-term vision, prudent short-term choices, and most of all, conscientious stewardship to rebuild this stock. We have done this before: indeed, striped bass is one of the east coast's greatest management successes. But the most recent stock assessment shows to me clearly, that while the challenges of the 1980s and 1990s were multilateral and diverse, this current situation is, sadly, brutally simple: we need to focus on the biological needs of the stock to give them—and those of us who use the resource—a chance.

To that end I endorse the positions put forward by the American Salt Water Guides Association, an organization with whom I have worked for three years, and whose principle members I have worked with for several more. In addition to their technical expertise on these issues, they bring a pragmatism and a willingness to see the cold hard facts of an issue to management discussions. For these reasons, and after reviewing the material myself, I support their following recommendations, viz:

On 4.1 Management Triggers:

- Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality
- Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold
- Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions
- Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality:

- Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method
- Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation:

- Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. We recognize this option may require more restrictive management measures than option A, which I support

On 4.4.2 Rebuilding Plan Framework:

- Option B to allow the Board to take direct management actions as well as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, “Management program equivalency (also known as “conservation equivalency” or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

I believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically, I support:

- Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level
- Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates
- Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries
- Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

Thank you,

Matthew McKenzie

CT Obligatory Delegate NEFMC, 2012-2021

Prof. of History and Maritime Studies, University of Connecticut

**From:** [Jonathan Hawes Ritter](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 6:36:49 AM

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To Whom it May Concern,

Growing up on the Slocum river in south dartmouth, ma - I've had a lifetime of enjoyment as an angler throughout buzzards bay and the nearby estuaries. Please consider regulations that will allow for repopulation of the species to protect the fishery for the next generation.

Thank you,

Jon Ritter  
29 wadsworth lane  
South dartmouth  
Ma  
02748

**From:** [Kyle Dancause](#)  
**To:** [Comments](#)  
**Cc:** [Stephen Train](#); [Sen. Dave Miramant](#); [Patrick Keliher](#); [Megan Ware](#); [Rep. JAY MCCREIGHT](#); [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 6:32:01 AM

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I am writing this morning to urge the commission to take strong measures to protect Striped Bass and rebuild the stock. Stripers need our help. It's time the ASMFC stop delaying and take definitive science-based action to conserve and protect this wonderful game fish that is so ingrained with our New England culture. Please protect these fish.

For me, Stripers are about memories...

I'm 8 years old and I'm at Cliff House beach with my best friend, Kevin, and his father, Jon. With daylight fading, there are fish breaking the surface everywhere in the small rocky cove. Jon's line goes tight with a big fish in small water. Alongside my friend and other beach goers, we stand mesmerized along the shore and watch Jon fight the fish. Jon eventually lands a 38" Striped Bass, my first experience with this species...

I'm now 12 or so years old and swimming at Scarborough Beach with my family and neighborhood friends. When we look behind us to catch the next wave on our boogie boards, we are terrified to see a cresting wave full of hundreds of large fish coming right at us. We scream and run to the shore...

I'm 16 years old fishing the backside of Richmond Island in my friend's small Carolina Skiff. It's the first morning of the Royal River Striper Tournament. Hours pass and we've eaten a couple boxes of Hostess Donettes but seen no fish. My friends have lost interest and are talking about summer baseball and girls. My balloon disappears under the green water and I'm tight with a fish that is running out of the cove into deeper open water. When the drag screams and I'm starting to run out of line, my buddy drops his donut and pulls the engine started and we start chasing the fish as I scramble to retrieve the line. We eventually land the 42" fish and win 5th place in the tournament.

In that same summer, I'm fishing the rocks off Trundy Point with my new girlfriend, now my wife. I teach her to cast. She laughs nervously as the lure gets constantly stuck on a large weedy rock just below the surface. She screams when her line goes tight with a small schoolie striper, her first.

I'm 19, home from my first year of college and back at that same beach with my childhood friend Kevin. After encountering a huge school of mackerel, we chunk one on a balloon. Quickly, Kevin's line goes tight and I have to get very wet to help land a 28" fish.

I'm in my final year of college now and a family friend is teaching me to fly cast in a field behind the school. Weeks later after many hours of practice in that field, we are on the river. He lets me cast his nice 9wt while he tosses an old 7wt. We double up, my first ever Striper on a fly rod. We had many days and shared many fly fishing days before Craig had his stroke. He no longer can cast a fly rod.

I'm 28 and I've moved back home to Maine and bought a house with my wife in South Portland. I kayak off from Ferry Beach before sunrise and up the Nonesuch river against the



current. A large sturgeon jumps just off the Pine Point dock and startles me. Eventually further up the river, I find a deep and narrow channel where I swing an olive/white clouser. A school comes through and I land 5 fish right in a row, carefully releasing them by keeping them wet, no pictures, easily removing the barbless hook from the lip.

I'm 31 and we wade out at flood tide to the boundary sign on the Spurwink River. The last fishing day before my good buddy moves West to Colorado. He gets the one fish of the night before the bugs chase us to our car where I give him some flies I've recently tied.

I'm 32 and I'm tying crabs and clousers in my basement. My daughter, our first child is due any day. I tie the green and olive crab pattern but put a strand of pink and purple flash - the "Avery crab."

I'm 33 now and wondering if Avery will ride in my kayak down the rivers and join me on the rocks of Maine this summer. I'm wondering if I'll be able to show her a fish? I wonder if I should even be fishing for these fish anymore? Will Avery ever catch a Striper with me? Will she be able to fish for them in 10 years? Will she be able to bring her children to fish for Stripers?

Please protect these fish. I am in full 100% support of the ASGA's positions on conserving and rebuilding this stock. Specifically, I feel very strongly that the Commission does not delay action. Fishing mortality must be reduced to the target NOW. No more kicking the can down the road. Leave the triggers in place but act on them. The stock is being overfished. We know that. We've known that for many years now. No more deferred management. Please, protect these fish now. Rebuild the stock. Protect Striped Bass. Protect the memories.

Kyle Dancause  
South Portland, ME  
Recreational Kayak fly angler

**From:** [Brian Hickey](#)  
**To:** [Comments](#)  
**Subject:** [External] ASMFC Amendment 7 - FISHERIES  
**Date:** Friday, April 15, 2022 6:20:16 AM

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Dear ASMFC

There is a phrase , albeit from a scene from the Star Trek series and movies, the goes," the needs of the many outweigh the needs of the few".

This could not be more applicable to the Striped Bass fishery and the impacts from both commercial harvesters and even in some instances recreational participants.

I am 56 and live in Southeastern Massachusetts. I have regularly and actively fished Cape Cod and Buzzards Bays fisheries most of my life and the changes to the Striped fishery are Quite noticeable - for fish size and fish presence and in particular in the last 15 years. I have 4 kids and some day would like to be able to enjoy the same sports fishing pleasures with my future grandkids that I have had with my kids and for those grandkids to have that experience as well.

Please vote to support active conservation measures so this resource can survive overfishing and have a future.

I enthusiastically support the following related options

4.1

Tier 1

Option A- Support A1

Option B - Support B1

Option C- Support C1

Tier 2

Option A- Support A2

Option B - Support B1

Option C- Support C1

Tier 3

Option A - Support A2

Option B - Support B2

Tier 4

Support A

4.2

Option B - support no measure

Option C - Support C1, C2

Option D - Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B

4.6.2

Option B - Support B1-a

Option C- Support C3

Option D - Support D2

Option E - Support E2

Please take this opportunity to be TRULY accountable to your website quote on your purpose - OUR COMMISSIONERS ARE DEDICATED TO LEAVING HEALTHY AND ABUNDANT MARINE FISHERIES FOR THE NEXT GENERATION TO ENJOY.

Sincerely,

Brian M Hickey

1348 Tremont Street

Duxbury, MA 02332

**From:** [Jake Carsey](#)  
**To:** [Comments](#)  
**Subject:** [External]  
**Date:** Friday, April 15, 2022 6:15:59 AM

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My name is Jake Carsey and I am an avid boat fisherman from the state of New Jersey. Fishing for striped bass is my favorite salt water species to target I fish from both beach and boat I know plenty of boat fisherman and plenty of surf fisherman. People need to start opening up there eyes a little more and practice catch and release but also the people who already do catch and release 9/10 times could have done something better to increase the chance of the fish living after being caught. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Jake Carsey  
Woodbridge, New Jersey  
Email: [futureyanker@gmail.com](mailto:futureyanker@gmail.com)

**From:** [John Torosian](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 6:14:03 AM

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Hello first let me say that I believe that the striped bass stocks are not as low as some people think. I fish the commercial season on the north shore of massachusetts and have seen the number of large and school sized striped bass increase over the past 10 years. I also fish recreationally and pursuing these fish is large part of my life as well as a significant portion of my income. I believe that like every other fish in the north atlantic there range has shifted north more in recent years. At the same time the recreational fishery has grown out of control I see so much hook damage on these fish it isn't funny. I believe that the recreational release mortality is the biggest threat to this fishery. I think that lures with treble hooks do some of the worst damage. I also absolutely hate the slot limit as this is removing fish before they have a chance to spawn. I think that if every striped bass was allowed to spawn and replace itself in the ecosystem before being harvested then we would never have a problem. There needs to be more of a focus on protecting school size fish. Let us remember what saved this fishery when there was a real problem back in the 1980s and 90s and that was a large size limit of 36". This larger size limit assured that every fish was given a chance to spawn.

Thank you  
John Torosian F/V Mya Marie, Beverly Mass

**From:** [ROBERT MARKUS](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 5:34:47 AM

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I no longer trailer my boat to go north to the Raritan to fish for Striper. It now longer is worth it for so little take I see how many fish move in each year and the amount of fish that come into the area is very large ever year your regulations are hurting the fishing economy.

Sent from my iPhone

**From:** [david brehm](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 4:55:13 AM

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Hello to whom it may concern,

My name is Dave Brehm and I am a life long striped bass fisherman from Suffolk County New York. While not a guide or have any job in the industry this fishery has had an immense impact on my life. With that being said I would like to set forth my comments on Amendment 7 as I believe it will have a large bearing on the nature of the fishery for years to come.

Options I support:

Section 4.1 Management Triggers

Tier 1: Fishing Mortality (F) Triggers

Option A: Suboption A1 Status quo

Option B: Suboption B1 Status quo

Option C: Suboption C1 Status quo

Tier 2: Spawning Stock (SSB) Biomass Triggers

Option A: Suboption A2

Option B: Suboption B1 Status quo

Option C: Suboption C1

Tier 3: Recruitment Triggers

Option A: Suboption A2

Option B: Suboption B2

Tier 4: Deferred Management Plan

Option A: Option A

4.2.2 Measures To Address Recreational Release Mortality

Option C: Suboption C1 & Suboption C2

4.4 Rebuilding Plan

4.4.1 Recruitment Assumption For Rebuilding Calculation

Option B: Option B

4.4.2 Rebuilding Plan Framework

Option B: Option B



#### 4.6.2 Management Program Equivalency

Option B: Suboption B1

Option C: Suboption C3

Option D: Suboption D2

Option E: Suboption E2

Thank you for your consideration and I hope that this will make an impact in some way even if it's saving one fish.

Dave Brehm

Sent from my iPhone

**From:** [jtaverasc5@yahoo.com](mailto:jtaverasc5@yahoo.com)  
**To:** [Comments](#)  
**Subject:** [External] Comment for Draft Amendment 7  
**Date:** Friday, April 15, 2022 3:53:18 AM

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My name is Joseph Taveras and I am an avid surfcaster from the state of Massachusetts. Striped bass is not just a fish to most us avid fisherman! It's a way of life! It's a passion for something like I have never experienced with anything else. As someone who is out in the surf 4-5+ Days a week I can say the population has been on a steady and rapid decline and in danger! I would love for action to be taken now before we have put this species in a greater danger! My kids and grandchildren and generations to come should have these fish protected for them, for the future of striped bass! Please take action and help save this species!!!! Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Joseph Taveras  
Methuen, Massachusetts  
Email: [jtaverasdc5@yahoo.com](mailto:jtaverasdc5@yahoo.com)

Sent from my iPhone

**From:** [Grethe Lindemann](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 2:57:53 AM

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Emilie Franke  
Fishery Management Plan Coordinator  
1050 N. Highland St, Suite 200A-N Arlington, VA 22201

By email: [comments@asmfc.org](mailto:comments@asmfc.org)  
Subject line: Draft Amendment 7

I am a Virginia native who grew up fortunate enough to enjoy the bounty of the Chesapeake Bay, and many activities it offers from fishing, crabbing, boating, and more.

I became an award-winning NASA engineer; then completed doctoral studies in neuroscience at Johns Hopkins University; and ultimately became an award-winning economic development non-profit and for-profit entrepreneur.

I am keenly interested in seeing to the vitality into perpetuity of our magnificent Bay, and all its riches. This very much includes all the wonderful lifeforms it holds.

I see the problems facing almost all our regional marine life now -- and particularly the striped bass -- as being that of increasing, ultimately catastrophic mortality, the origins of which are largely traceably and simply human caused.

To curb and reverse this mortality I suggest:

**1) Taking the urgent near-term step of imposing a one-or-more years' moratorium on fishing, without exception.**

**2) Maintain the management triggers that should spur action when the rockfish population indicates action is needed.**

**3) Eliminate catch-and-release altogether. See more on this below. Failing total elimination, implement strict measures to ensure considerably more rockfish survive catch-and-release.** The ASMFC should adopt additional measures in order to increase the survival of fish that are caught and then released.

**4) If necessary, AMSFC should adopt additional conservation measures based on a new population estimate scheduled to be released in the fall of this year.**

**5) It's time to take a hard look at Conservation Equivalency (CE) program.** This program allows each state to set its own unique regulations to manage rockfish while still aiming to meet ASMFC fishery management plans. For far too long states have developed CE proposals that have not met the intended conservation benefit. This has unfortunately, left the biological condition of the rockfish stock in worse shape than it should have been. This program must be revised to ensure the actions states are taking are effective.

#### **Regarding Catch-and-Release:**

Catch-and-Release is not sport. It is an appalling opposite to true sport. It is the sanctioned brutalization, torture, and/or murder of innocent sentient creatures. Worse, as seemingly sanctioned by "adults" – it trains young minds that such behavior is acceptable. Such behavior, when sanctioned, spreads to horrific behaviors that hurt other innocents, from animals, to humans, to our planet overall.

Beyond and irrefutably: Catch-and-Release renders meaningless any well-intentioned other catch or size limits (by size or quantity).

Those fish released – of whatever size – are at the very least seriously damaged, and may never be able to resume viable lives. Whether they live or die, they then become open for disease/failure to thrive – which DOES occur – and in so doing increase by infection or contamination through their sick exudation would-be healthy specimens of their own species or other. The perpetuation of unhealthy and disease states of species and the environment multiplies. Mortality increase is unavoidable in such a scenario.

As horrific as this picture – this reality – is, it can be simply ended by ceasing forever Catch-and-Release.

The argument that businesses supporting the activity (tackle, gear, boating, charter, etc.) will be irreparably hurt is a foolish groundless one. As time marches on, so too must business adapt. The sporting industry offers myriad possibilities for replacing actual catch and release with technologically satisfactory and fun replacement (e.g., through virtual reality in arcade or at-home settings, etc.) with the possibility of venues making such a family activity far more accessible to more people (and lucrative to business). Businesses can prosper far beyond, and sustainably so, what they do already by ending Catch-and-Release. The individuals then properly respectfully trained to fish can do so in due course to catch – if at all – for sustenance alone.

\*\*\*\*\*

Thank you for considering my comments. I know the individuals to whom this is directed care deeply about our marine wonder, and whom I trust will do the right thing. The needed steps are not easy and they take courage. I and others will support such moves to the utmost, I assure you.

With sincere thanks,

A. M. Lindemann  
5201 Studeley Ave  
Norfolk VA 23508  
[grethelindemann@gmail.com](mailto:grethelindemann@gmail.com)

**From:** [IFISHLI](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 2:53:46 AM

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Hi my name is Matthew Bauer,

I am 21 years old from Long Island, New York I am currently studying Environmental Science and Management at the University of Rhode Island. Striped Bass are extremely important to me. Surfcasting for Striped Bass is my favorite thing to do. I drive all over the coast in search of them. It is apparent that the population is in need of our help. I want to be able to enjoy Striped Bass fishing for years to come. I hope one day to be able to catch Striped Bass with my kids. The Striped Bass needs better regulations! These are my choices for amendment 7:

I support

4.1

Tier 1

A1

B1

C1

Tier 2

A2

B1

C1

Tier 3

A2

B2

Tier 4

A

4.2

B- None

C1,C2

D2

4.4. 1

B

4.6.2

B1-a

C3

D2

E2

**From:** [Eric Brown](#)  
**To:** [Comments](#); [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Re: Draft Amendment 7  
**Date:** Friday, April 15, 2022 2:08:34 AM

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On Thu, Apr 14, 2022 at 11:41 AM Eric Brown <[ecb23@geneseo.edu](mailto:ecb23@geneseo.edu)> wrote:  
| Striped bass are an iconic gamefish and integral part of our marine ecosystem. They need to  
| be protected for future generations. Moratorium is necessary.

**From:** [Philip McCartney](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 15, 2022 12:22:05 AM

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I have taught mathematics for over 50 years. Lowering standards in education is not a good idea, nor is lowering standards in the management of fisheries a good idea.

Is there a commitment to do what is in the long-term best interest of the fishery based upon the best information available? How effective have past management efforts been in rebuilding the striped bass population along our country's East Coast? Please show that the Board can learn from past mistakes.

Wishing away problems does not solve them.

Please demonstrate wisdom and commit to rebuilding the striped bass fishery. Future generations depend on us to preserve and protect this resource.

Please join me in support the recommendations of the American Saltwater Guides Association.

I have summarized and highlighted those recommendations:

Phil McCartney

#### **4.1 Management Trigger**

Tier 1: Fishing Mortality (F) Triggers

##### **Option A: Timeline to Reduce F to the Target**

**Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year.

##### **Option B: F Threshold Triggers**

**Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

##### **Option C: F Target Triggers**

**Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

Tier 2: Spawning Stock Biomass (SSB) Triggers

##### **Option A: Deadline to Implement a Rebuilding Plan**

**Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan.** The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

##### **Option B: SSB Threshold Trigger**

**Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

##### **Option C: SSB Target Trigger**

**Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass



management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

Tier 3: Recruitment Triggers

#### **Option A: Recruitment Trigger Definition**

**Sub-option A2:** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)11 shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

#### **Option B: Management Response to Recruitment Trigger**

**Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

Tier 4: Deferred Management Action

#### **Option A (status quo): No Deferred Management Action.**

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

#### **4.2.2 Measures to Address Recreational Release Mortality**

##### **Option C. Additional Gear Restrictions**

**Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

##### **Option D. Outreach and Education**

**Sub-option D2:** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

#### **4.4 Rebuilding Plan**

##### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

**Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

##### **4.4.2 Rebuilding Plan Framework**

**Option B:** 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 recruitment assumption specified in Amendment 7) 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.

##### **4.6.2 Management Program Equivalency (Conservation Equivalency)**

###### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

**Sub-option B1-a:** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

###### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

**Sub-option C3:** CE proposals would not be able to use Marine Recreational Information

Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

**Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

**Sub-option D2:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

**Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

**Sub-option E2:** the percent reduction/liberalization projected for the FMP standard at the state-specific level.

**From:** [Fish Kulture](#)  
**To:** [Comments](#)  
**Subject:** [External] Comment for Amendment 7  
**Date:** Friday, April 15, 2022 12:16:31 AM

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My name is Matthew Kircheim and I am an avid surfcaster from the state of New York.  
“Striped bass are meant to be caught in the surf.” -Bill Wetzel  
No other fish gives you that chance to catch a 5lb or a 50lb fish on the same cast less then 100 yards from shore on the east coast. Without proper management the livelihood and obsession that is surf fishing for Stripers will not continue to exist. We need to do all we can now to help create a population of healthy and breeding striped bass so future generations can enjoy the fishery as well. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Matthew Kircheim

West Babylon, New York

Email: [thefishkulture@gmail.com](mailto:thefishkulture@gmail.com)

Sent from my iPhone

**From:** [dinoshark](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 15, 2022 12:12:43 AM

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Hi my name is Mark Johnson, I have always enjoyed time out on the water. Especially when there are striped bass around. They are a beautiful and interesting creature that provides me many hours of fun every year. I've spend years fishing for striper bass and it would be so unfortunate to lose them.

I am against the use of conservation equivalency. We need to minimize flexibility and increase regulations. We cannot leave it up to the states to take advantage of this.

In regards to tier 1 a target of 1 year is a shows the urgency in this matter, we would essentially give the opportunity to the population to maintain growth trends and therefore continue to increase the population.

Striped bass are a valuable resource and an amazing animal we need to do what we can to protect them for future generations.

Thanks,  
Mark

**From:** [Adam Mitchell](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 11:59:45 PM

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Dear Members of the Management Board:

As an avid fly fisherman from the Adirondacks, my exposure to salt water fishing has been quite limited. I have never been fortunate enough to target striped bass in my life thus far, but the idea has had a firm place on my bucket list for quite some time. However, this amendment has enlightened me with recent striper conservation and our need to make a change. Hitherto, I had no idea that the chance to fulfill one of my highest dreams was dwindling. With the security of the species under threat, it is our moral obligation to make a change to our current conservation strategies. I still intend to make a mark on my bucket list, but I want my children to do the same. Without urgent success however, I'm not sure they will. Let us put politics and personal opinions aside for a moment and make a positive impactful change for the benefit of the species, the ecosystem, and ourselves. I hope you will take my following suggestions with thoughtful consideration.

As a supporter of Backcountry Hunters and Anglers I appreciate the opportunity to provide comments on Draft Amendment 7, and to advise the ASMFC on the general priorities and specific options I would like to see included in Amendment 7.

Since Amendment 6 was adopted in 2003 the stock has declined to overfished levels because excessive overfishing has been allowed. I feel that some significant changes are needed to reverse this trend, and that the overall goals for Amendment 7 should be to recover the Striped Bass stock as soon as reasonably possible and to implement policies to ensure target levels are maintained long-term after recovery.

To accomplish these goals, I urge the Board to include the following options in Amendment 7:

#### 4.1 Management Triggers

Tier 1 - A1, B1, C1

Tier 2 - A2, B1, C2

Tier 3 - A2, B2

Tier 4 - A

#### 4.2.2 Recreational Release Mortality

Sub-Options C1, C2, D2

#### 4.4 Rebuilding Plan

4.4.1 Option B

4.4.2 Option B

#### 4.6.2 Management Program Equivalency

Sub-options B1-a, C3, D2, E2

Thank you for your consideration,

Adam Mitchell

Castleton University BHA Chapter President

B.S. Environmental Science

B.S. Mathematics

287 Blood Street

Granville, NY 12832-3718

**From:** [Robert Pistorino](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped bass  
**Date:** Thursday, April 14, 2022 11:45:28 PM

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Please let's just stop kicking the can down the road and make striped bass a gamefish, no possession at all. It'll just keep getting worse if we don't.

Sent from my iPhone



**From:** [Jared Wood](#)  
**To:** [Comments](#)  
**Subject:** [External] Ammendment 7 Public Comment  
**Date:** Thursday, April 14, 2022 11:43:51 PM

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Dear ASMFC Members,

My name is Jared Wood from New Hampshire. Striped Bass are important to me because my children love them more than I do. Fishing for Stripers with my kids is something that I enjoy and I want them to be able to enjoy it with children of their own someday. It is critical we put Striped Bass on the road to recovery. Therefore I support following:

Tier 1

Option A support A1  
Option B support B1  
Option C support C1

Tier 2

Option A support A2  
Option B support B1  
Option C support C1

Tier 3

Option A support A2  
Option B support B2

Tier 4

Support A

4.2

Option B support no measure  
Option C support C1 C2  
Option D support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Option B support B1-a  
Option C support C3  
Option D support D2  
Option E support E2

I thank you for your time and consideration during this public comment period.

Thank You,  
Jared Wood

**From:** [Karr, John](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass  
**Date:** Thursday, April 14, 2022 11:36:15 PM

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Stripers have a larger recreational fishing value than commercial. There is no need for people to be keeping and killing so many fish. Many people break the law and keep over slot fish, and law currently allows unlimited slot fish. In my opinion there needs limits/tags on slot fish, and harsher punishments for those who keep over slot fish.

I love these fish and want them to survive for generations to come.

Sincerely,  
John Karr

**From:** [Joel Johnson](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 11:35:40 PM

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To the Commission,

I write in support of any measure that will increase the recruitment of American striped bass. As an angler, if I have to stop fly fishing for them in order for stocks to recover, I will. As a Marylander, if I have to stop eating rockfish in order to set an example, I will.

I would do it not just for the bass, but for the entire ecosystem this keystone species supports. Its niche has been devastated again and again by human encroachment at all levels, and urge the ASMFC do what it must to protect the species, the ecosystem, and the biodiversity around it.

Sincerely,  
[Joel R. Johnson](#)  
202-505-0165

**From:** [Rich](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 11:21:17 PM

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Hi my name is Rich Cordeiro

I grew up fishing in the 80s and I know firsthand of how bad the striperbass population decline was! I believe we need better regulation of stripers up and down the coast in effort to save the current striped bass. Thanks  
Sent from my iPhone

**From:** [David Awad](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 11:18:56 PM

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My name is David Awad and I am an avid surfcaster from the state of New Jersey. I've fished for striped bass when I was younger and remember how much fun I used to have sitting on the sand with my older cousins. About 10 years later I became more interested and now spend countless hours on the water thanks to the good times I spend with family admiring the beauty of this amazing fish.

I support sub option B1-A in response to point 4.6.2. I am against the use of conservation equivalency in the case of striped bass. We need more stringent regulations that aren't capitalized on by individual states. The flexibility encouraged by this point maintains an extremely adverse effect on the population of striped bass as individual states would be able to take advantage. I implore you to please consider doing away with conservation equivalency as a whole.

I am in favor of A1 in Tier One. A target of 1 year is a statement of the importance and urgency in the given situation. By reducing mortality to the target within 1 year we would essentially give the opportunity to the population to maintain growth trends and therefore continue to increase the population.

In regards to Tier Four, I am in favor of option A. We do not need to defer management action. This issue at hand needs to be fixed and needs to be fixed now. We need to take a stand and we need to do it now. The longer we delay action, the more devastating the impact will be on the species.

I do not want to lose another resource on this planet and lose something so dear to my heart. We need to take the proper action and we need to do it now. We need to protect this fishery for generations to come. Thank you for your time and for your concern.

Regards,  
David Awad

**From:** [Jeffrey Amorello](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 11:16:41 PM

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Hello - my name is Jeff Amorello and I am an avid recreational striped bass fisherman in the Western Long Island Sound (CT) and Rhode Island. I live to fish for striped bass. I spend hundreds of hours and thousands of dollars a year (boat, insurance, dockage, maintenance, fuel, fishing gear etc) pursuing my passion to chase this incredible fish. Over the last several years, we've all seen the science and first hand examples of the decline of the striped bass stock and our collective inability to effectively manage the abundance of the species. I am writing this letter to express my major concern with current fisheries management policies and action, and believe that if we don't act now and make significant changes solely for the greater good of the striped bass stock, it will be too late. Please consider my comments and support for the options below in saving what's left of our striped bass fishery.

I support the following options:

#### **4.1**

##### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

##### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

##### **Tier 3**

Option A- Support A2

Option B- Support B2

##### **Tier 4**

Support A

#### **4.2**

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D2

#### **4.4.1**

Support B

#### **4.4.2**

Support B

#### **4.6.2**

Option B- Support B1-a

Option C- Support C3

Option D- Support D2

Option E- Support E2

Thank you,

Jeff Amorello



**From:** [Matthew Comerford](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 11:07:17 PM

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Dear ASMFC Managers,

I would like to take this opportunity to express my concern for the state of the Striped Bass fishery in the northeast. My observations coincide with ASMFC's findings that the stock is overfished.

I have been fortunate to spend most of my summers from May through October in Sandwich MA on Cape Cod. Much of my time down there is spent chasing Striped Bass up and down the beaches between Barnstable Harbor and Scusset Beach. I also frequent the Cape Cod Cana when crowds are not too bad. When the weather is good we will fish from a small boat in Cape Cod Bay.

By fishing a relatively small stretch of coastline multiple days a week every year you gain a sixth sense. You start to realize when each class of fish is here. You also learn when and why they set up in the bay when they do. As I have become a better fisherman Striped Bass have become tougher to catch. The fish are not showing up in the numbers they should be. I believe this is only because of overfishing.

Another hobby of mine I enjoy down there is free diving in the small tidal rivers of Cape Cod Bay on the ebbing tide. My brothers and I will start up the creeks with a snorkel and fins and float out observing all the marine life. It is apparent to me that less Striped Bass are showing up in the same spots we always find them. The schools that we do find have a lot less fish than they did years ago.

Due to these observations, I support the below options:

Section 4.1 Management Triggers

Tier 1: Fishing Mortality (F) Triggers

Option A: Sub-option A1

Option B: Sub-option B1

Option C: Sub-option C1

Tier 2: Spawning Stock Biomass (SSB) Triggers

Option A: Sub-option A2

Option B: Sub-option B1

Option C: Sub-option C3

Tier 3: Recruitment Triggers

Option A: Sub-option A2

Option B: ASA's Variation of Sub-option B2

Tier 4: Deferred Mgmt Action

Option A: No Deferred Management Action

Section 4.2.2 Measures to address Recreational Release Mortality

Option B: Sub-option B2-a No Harvest Spawning Closure

Option C: Sub-option C1 & C2

Option D: Sub-option D1

4.4.1 Recruitment Assumption

Option B

4.4.2 Rebuilding Plan Framework

Option B

4.6.2 Management Program Equivalency

Option B: Sub-option B1-a & B1-c

Option C: Sub-option C3 Option D: Sub-option D1

Option E: Sub-option E2

Regards,

Matthew S. Comerford

**From:** [Mike Rallo](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass  
**Date:** Thursday, April 14, 2022 10:56:31 PM

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Save the bass!

Sent from my iPhone

**From:** [david.s.saju@gmail.com](mailto:david.s.saju@gmail.com)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 10:54:50 PM

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Dear ASMFC,

I am writing this email to you in regards to the current state of the striper fishing industry and the lack of effort and governance to protect these fish. I am turning 25 years old this year and have only been fishing for the last 5 years. I have met one of my closest friends out fishing and have shared many great moments this past year. My interest in fishing has exploded, from just catching fish to really understanding the beauty of the fish, especially the striped bass. I have seen the impact of overfishing and useless laws to "protect" these fish. I urge you to come to an agreement with minds of those who are actually here to fish not just today but for the rest of our lives. We live in a time where everything is connected and the fishing industry is reaching new heights. As this sport is growing fast, we need to set the proper laws to ensure it can continue to grow. I am requesting a change to the current striped bass management and restore the stock to abundant, healthy levels so that fishing will continue as more than catching fish. Thank you for your time, thank you for listening to the people. The future is in your hands.

Thank you.

**From:** [David Van Gulick](#)  
**To:** [Comments](#)  
**Subject:** [External] Comment for Amendment 7  
**Date:** Thursday, April 14, 2022 10:46:44 PM

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My name is David Van Gulick and I am an avid boat fisherman from the state of New Jersey. The striped bass fishery is more than a past time for me, as well as many other anglers out on the water. Living in such a busy and highly populated area the striped bass fishery is constantly under stress and from recreational and commercial fishermen, I hear way to many stories from my grandfather and other older anglers describing the good old days when thousands of bass use to migrate up the river like schooling bait. It's more than evident that the striped bass population has been declining rapidly in the past decade and it's our responsibility as anglers and humans to take care of not only the fish that we love but the environment as well. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

David Van Gulick  
Lavallete, New Jersey  
Email: [david1099@icloud.com](mailto:david1099@icloud.com)

**From:** [Jim Fitzgerald](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7 to the Atlantic Striped Bass Management Plan.  
**Date:** Thursday, April 14, 2022 10:40:30 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)

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To the Advisors and Board Members of the Atlantic States Marine Fisheries Commission-

As an avid fisherman I wanted to offer comments on the draft of Amendment 7. I have fish for the last 50+ years primarily on the coastal waters of the south shore of Massachusetts. I have seen the resurgence of the striper population over the last several decades that resulted from prudent conservation. I do not want changes to upset the balance between a vital fishery and the regulations needed to protect the fish. I attended a presentation on the amendment held in Marshfield MA by the American Saltwater Guide Association to learn more about the proposed amendment options and found that I concur with the positions put forward but the ASGA as follows:

On 4.1 Management Triggers, I support:

- Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality
- Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold
- Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions
- Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, I support:

- Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method
- Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, I support:

- Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. We recognize this option may require more restrictive management measures than option A, which we support

On 4.4.2 Rebuilding Plan Framework, I support:

- Option B to allow the Board to take direct management actions as well as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, "Management program equivalency (also known as "conservation equivalency" or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level

of conservation for the resource under management.”

I believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically, I support:

- Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level
- Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates
- Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries
- Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

The text on the positions is taken directly from the ASGA position but the sentiments expressed are mine. I wanted to use their prepared explanation so that I did not make an error in the wording of my positions. I know how critical getting the comments correctly phrased means in official government. Thank you for providing the opportunity to comment on Amendment 7. I look forward to reading the final version of the Amendment.

I appreciate your consideration,

Jim

**Jim Fitzgerald**



293 Lenox Street  
Norwood, MA 02062

o. 781-948-1824

f. 781-440-2623

c. 617-719-3697

e. [JFitzgerald@mysticmillwork.com](mailto:JFitzgerald@mysticmillwork.com)

w. [www.mysticscenic.com](http://www.mysticscenic.com)





From: [mb92107@yahoo.com](mailto:mb92107@yahoo.com)  
To: [Comments](#)  
Subject: [External] Comment for Amendment 7  
Date: Thursday, April 14, 2022 10:33:28 PM

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Striped Bass Amendment 7

Tomb92107@yahoo.com

Apr 14 at 10:25 PM

My name is Matt Boyer and I am an avid surfcaster from the state of Pennsylvania. I fish from a boat and the surf jetty riverside bay and in kayaks. The striped bass fishery and my family is everything to me . I want a strong fishery for generations to come. We need to do something to bring back historical high biomass in this fishery . In my years of fishing I have seen the decline I would stop the commercial harvest of these fish personally but if that's not possible limit to rod and reel no Gill nets and bycatch set strict limits per boat. For recreational set one at 38" give them more time to spawn. Maybe a one fish slot from 38-40" . I would prefer gamefish status . Thanks for your time reading this . Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2  
Support D2

4.4.1  
Support B

4.4.2  
Support B

4.6.2  
Support B1-a  
Support C3  
Support D2  
Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Matt Boyer  
Reading, Pennsylvania  
Email: [mb92107@yahoo.com](mailto:mb92107@yahoo.com)

From: [Nick Menchyk](#)  
To: [Comments](#)  
Subject: [External] Draft Amendment 7  
Date: Thursday, April 14, 2022 10:28:00 PM

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**I support the following options suggested by Strippers Forever. Please save this fishery! Thank you, Nick Menchyk, Patchogue, NY**

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**TIER 1 OPTIONS: Fishing Mortality (F) Triggers– Option A: Timeline to Reduce F to the Target– SF supports Sub-option A1 (status quo): Reduce F to a level that is at or below the target within one year.**

- Reasoning: We believe that wherever possible the board should move as quickly as possible to reduce fishing mortality. Sub-option A1 offers the shortest timeframe to get it back below the target.

–Option B: F Threshold Triggers– SF supports Sub-option B1 (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

- Reasoning: Best of the two sub-options, action will not be taken under B2 unless a two year average of F exceeds the F threshold.

–Option C: F Target Triggers– SF supports Sub-option C1 (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

- Reasoning: Best of the three sub options in regards to action trigger in the least amount of time. C2 requires 3 years of F exceeding F target and C3 has no trigger related to F target.

**TIER 2 OPTIONS: Female Spawning Stock Biomass (SSB) Management Triggers**

–Option A: Deadline to Implement a Rebuilding Plan– SF supports Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment.

- Reasoning: This option puts in place a two-year deadline to implement a rebuilding plan. A1 (status quo) does not put in place a deadline to implement a rebuilding plan.

–Option B: SSB Threshold Trigger– SF supports Sub-option B1 (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

- Reasoning: B2 offers no trigger related to the female SSB threshold. We believe that while an F trigger would likely be in place it is also important to keep an eye on and take corrective measures if the female SSB is in trouble.

–Option C: SSB Target Trigger– SF supports Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

- Reasoning: Again, C1 offers the shortest time frame to rebuilding if the female SSB falls below the target. C2 requires 3 consecutive years and C3 contains no management trigger related to the female SSB target.

**TIER 3 OPTIONS: Recruitment Triggers**

–Option A: Recruitment Trigger Definition– SF supports Sub-option A3: The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model (NY, NJ, MD, VA) shows an index value that is below the median of all values in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years. The high recruitment reference period used for this trigger may be adjusted as recommended by the TC during benchmark stock assessments. This trigger alternative has a higher sensitivity than both the status quo trigger and sub-option A2 (Figure 1). This trigger alternative would have tripped six times since 2003: NY in 2006; MD in 2008; MD in 2009; MD and VA in 2010; NY in 2013; MD in 2014 (Table 2).

- Reasoning: The status quo (current trigger) has only been tripped once in the time period between 2003-2020, clearly it is not sensitive enough based on where the stock is currently at. A2 would have tripped the trigger 3 times in that same time period. A3, while classified as a “high sensitivity trigger”, would have tripped the trigger 6 times in that same time frame. As with the other options supported, we believe the board needs to operate with more caution moving forward, being aware of and addressing years of low recruitment ASAP.

–Option B: Management Response to Recruitment Trigger– SF supports Sub-option B2. If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

- Reasoning: In the past, the board has failed to adjust F to account for both good and bad year classes (recruitment). With several recent years of poor year classes we need the board to be more responsive to these shifts. B2 puts an interim F target adjustment in place if the recruitment trigger is tripped.

**TIER 4 OPTIONS: Deferred Management Action**

–SF supports Option A (status quo): No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

- Reasoning: We cannot support any options which allow the board to defer action if a management trigger is tripped. Options B-F all allow for deferred action by the board in the event of a management trigger. Given where the stock is currently at, overfished with overfishing occurring, the “Board’s concern about the frequent need for management action due to triggers tripping with each stock assessment update or benchmark” is quite frankly, absurd. Stock assessments are typically conducted every 2 years (COVID delayed the last one) and benchmark assessments every 5 years. If the board needs to convene and take action more frequently to maintain a healthy stock then so be it.

## 4.2 Recreational Fishery Management Measures

### Option B. Effort Controls (Seasonal Closures)

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-SF supports Sub-option B2. Spawning Area Closures: The Board can select either or both of the following sub-options B2-a and B2-b. Multiple states currently have spawning closures in place with closure boundaries defined by those states. Existing spawning closures would be applied toward meeting the requirements of the selected option(s).<sup>15</sup> Spawning area closures during the spawning season could contribute to stock rebuilding by eliminating harvest and/or reducing releases of spawning and pre-spawn fish. Reducing releases during this time is particularly important to reduce stress and injury to fish as they move into lower salinity spawning areas. If new information on the timing of striped bass spawning is available in the future, the TC would conduct a review of that research and recommend changes to the timing of spawning closures if needed. If this option is selected, CE would not be permitted.

-SF supports Sub-option B2-b. No-Targeting Spawning Closure Required: All recreational targeting of striped bass would be prohibited for a minimum two-week period on all spawning grounds (not necessarily the entire spawning area) during Wave 2 (March-April) or Wave 3 (May-June), as determined by states to align with peak spawning. States will determine the boundaries of spawning ground closures. Closures prohibiting recreational targeting on spawning grounds have already been implemented in Maine (Kennebec River), New Jersey (Delaware River), and Maryland (Chesapeake Bay) during part of Wave 2 and/or Wave 3 (Figure 4).

- Reasoning: This is an important one! And while this is a complex section of Amendment 7 we believe it is vital to the recovery of the SSB and stock as a whole. Sub-option b2-a would prohibit harvest but allow for catch and release, b2-b would be a no targeting closure and would provide the best protection for the SSB while they spawn. The option is somewhat open ended with the language calling for a "minimum two-week period," we would like to see it closer to a four or six week period in order to see the best results and gain the most protection for the SSB. Many other species benefit from shortened seasons or spawning closures and Striped Bass should as well. Considering the stock is currently overfished with overfishing occurring, the least we can do is allow for uninterrupted spawning. The argument that Striped Bass would be a bycatch while fishing for Bluefish or other species is mostly null as Bluefish do not show up in great numbers until after this timeframe. The uncertainty regarding these options surround the definition of the spawning areas and the possibility that states may need to work together to provide the most amount of protection for the SSB as they stage ahead of the spawn and then move up into the river to do so. The best example of this is the case of the Hudson River where fish stage in Raritan Bay, New Jersey before ascending the Hudson River to spawn in NY. In a best case scenario this targeting closure would not only protect the spawning grounds but also the areas in which the SSB congregates prior to spawning, they go hand in hand. Despite these uncertainties we support these options with the hope that the TC and board will work together to develop these areas. Overall these options err on the side of caution but with the Striped Bass SSB and stock as a whole being in such a dire situation, we believe any gain, no matter how big is worth the risk involved.

### Option C. Additional Gear Restrictions

-SF supports Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

-SF supports Sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

- Reasoning: These options are a no brainer. Let's prevent the use of gaffs for removing fish from the water in the event that they would need to be released as slot limits require more fish to be released. C2 would require non circle hooked fish (J-hook when fishing for other species) to be returned to the water as soon as possible and with careful handling. Both of these measures combat recreational release mortality which has been determined to have a large effect on F.

### Option D. Outreach and Education

-SF supports Sub-option D1: States would be required to promote best striped bass handling and release practices by developing public education and outreach campaigns. States must provide updates on public education and outreach efforts in annual state compliance reports.

- Reasoning: Another easy option. States collect license fees and we believe some of that money should be spent on angler education and more specifically catch and release best practices. Option D2 only *recommends* that "states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns." We believe that this should not just be a recommendation but a requirement. Angler education is an essential method to help curb recreational release mortality and ultimately help rebuild the stock to abundance.

## 4.4 REBUILDING PLAN

### 4.4.1 Recruitment Assumption for Rebuilding Calculation

-SF supports Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

- Reasoning: As we have mentioned, young of year over the past 3 years has been well below average. Combine this with the fact that Addendum 6 only addressed mortality and not rebuilding the stock and now we are in a terrible spot. The writing has been on the wall for years, if you were on the water it was clear that the stock was in trouble. Option B bases the rebuild of the SSB on the 'low recruitment regime assumption,' more in line with the poor year classes previously mentioned. It would likely achieve a lower level of removals and require more restrictive management measures.

### 4.4.2 Rebuilding Plan Framework

-SF supports Option B: 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 recruitment assumption specified in Amendment 7) 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.

- Reasoning: A new stock assessment will be published in October 2022 and depending on the outcome it may have a massive impact on the measures being put in place by Amendment 7. It is an unfortunate situation and likely could have been avoided if the board took action sooner but it is a concession we should be willing to make to prevent a further delay in developing and putting into action an addendum to Amendment 7. As noted it appears the board is willing to allow some sort of public involvement in the process. "Under this option, public comment could be provided during Board meetings per the Commission's guidelines for public comment at Board meetings, and/or public comment could be provided in writing to the Board per the Commission's timeline for submission of written public comments prior to Board meetings."

## 4.6 ALTERNATIVE STATE MANAGEMENT REGIMES

### 4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option B. Restrict the Use of Conservation Equivalency Based on Stock Status

-SF supports Sub-option B1. Restrictions: CE programs would not be approved when Sub-option B1-a: the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

- Reasoning: While we were hoping to see conservation equivalency completely removed from the management process, that is not an option within Amendment 7. The TC has stated that the implementation of CE in the management process is unquantifiable and will likely cloud the regulations put in place by states to reach the overall reductions necessary. Option B, sub-option B1 provides the most limitations to the use of CE by states, some of whom have taken advantage of it. The stock needs to be managed for abundance and therefore we need to let the Commission know that CE has no place in a stock that is overfished with overfishing occurring. If you only choose to speak on or select a few options from A7, this should certainly be one of them.

#### **4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

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-SF supports [Sub-option C3: CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30.](#)

- Reasoning: This is the most conservative option available as stated in Amendment 7 "NMFS warns that "[MRIP] Estimates should be viewed with increasing caution as PSEs increase beyond 30. Large PSEs—those above 50—indicate high variability around the estimate and therefore low precision." We want to make sure the CE is only accessible if tightest estimate and least amount of risk.

#### **4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

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-SF supports [Sub-option D3: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 50%.](#)

- Reasoning: An uncertainty buffer refers to the previously mentioned unquantifiable results of states putting CE in place as pointed out by the TC. What this means in simple terms is, if a state wants to make use of CE they will need to plan for a buffer to account for possible overages of F. In other words it could be thought of as a tax for using CE. This will hopefully discourage states from using CE in the first place. We would like to see the biggest buffer possible (50%) put in place to dissuade states from trying to use CE. If they do opt to use it the 50% buffer would hopefully counteract the potential overages in F.

#### **4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

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-SF supports [Sub-option E2: Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state-specific level.](#)

- Reasoning: This is a bit convoluted but the bottom line is that this essentially undoes an unfortunate series of events that transpired during the addendum 6 process. New Jersey felt that the coastwide 18.5% reduction based on harvest was unfair as it translated to a larger reduction for them due to the complication of the slot limit. The board sided with New Jersey who then ultimately failed to meet its goals and in the end took no reduction.
-

**From:** [James Ludwig](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Ammendment 7  
**Date:** Thursday, April 14, 2022 10:19:20 PM

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My name is James Ludwig. I am a resident of New York and have fished for striped bass from shore on Long Island, Cape Cod, and Connecticut. Though I am relatively new to the sport of fishing, it is safe to say I am obsessed. I am passionate about striped bass management and have a great deal of respect for the work that all of you do.

I fished for trout in Maine with my grandfather as a child, and since becoming a father myself a few years ago, I have taken up fly fishing. Living on Long Island, I soon became interested in the salt and have developed a real love for striped bass.

As the parent of a young child, the evening and pre-dawn hours of striper fishing fit oddly well into my life. The solitude of waiting, listening, and feeling these fish is intoxicating to me. The excitement of connecting with one, the feeling of admiration I get when I hold it briefly before the release, and the resumption of the waiting game are indescribably therapeutic to me. I feel a strong connection between myself, nature, and to God when I fish for stripers in these hours and I want desperately to be able to share those moments with my 3-year old son, Rodes, when he is old enough to stand in those waters next to me.

Details regarding the exact measures I support are attached to this e-mail.

I am a member of the Connecticut Catch and Release Fishing Facebook Group. Their administrator Phil Sheffield has been a great influence on me, as has Paul Dinice. Phil and Paul are outstanding sportsman who help novices learn to practice our skill in this sport and also have guided me in developing my personal philosophy of catch and release.

Thank you for the work you do.  
Sincerely,  
James Ludwig

**4.1 Management Triggers:**

Tier 1:

- Option A1
- Option B1
- Option C1

Tier 2:

- Option A2
- Option B1
- Option C1

Tier 3:

- Option A3
- Option B2

Tier 4:

- Option A

**4.2.2 Recreational Release Mortality**

- Option A
- Option B1: Opposed
- Option B2: Opposed
- Option C1
- Option C2
- Option D1

**4.4.1 Rebuilding Plan**

Option B

**4.4.2 Rebuilding Plan Framework**

Option B

**4.6.2 Management Program Equivalency**

- Sub-Option B1a
- Sub-Option B1c
- Sub-Option B2b
- Sub-Option C3
- Sub-Option D3
- Sub-Option E2

**From:** [Will Buckingham](#)  
**To:** [Comments](#)  
**Cc:** [stripercoments@gmail.com](mailto:stripercoments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 10:16:08 PM

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My name is Will Buckingham, a Maryland native. I mainly fish on the Potomac river near DC and when I can I like to get out on the bay. I enjoy making yearly fishing trips to New Jersey and North Carolina, and hope to stretch that radius in the near future. Striped bass are one of my favorites to fish and it's hard to imagine the population will return to what it was years ago but something must be done outside of increased commercial fishing regulation and hefty fines. I strongly believe one area that can be addressed is the recreational fisherman. Education on the importance of catch & release + proper handling can go a long way. With today's social media presence the message can be reached far. I'll continue to do my part and educate myself. Here's a list of what I support:

#### 4.1 Management Triggers

##### Tier 1: Fishing Mortality (F) Triggers

Support Sub-option A1 (status quo)

Support Sub-option B1 (status quo)

Support Sub-option C1 (status quo)

##### Tier 2: Spawning Stock Biomass (SSB) Triggers

Support Sub-option A2

Support Sub-option B1 (status quo)

Support Sub-option C1 (status quo)

##### Tier 3: Recruitment Triggers

Support Sub-option A2

Support Sub-option B2.

##### Tier 4: Deferred Management Action

Support Option A (status quo): No Deferred Management Action.

#### 4.2.2 Measures to Address Recreational Release Mortality

Support option A. SQ

Support an expanded and more developed option B2-a to include the entire coast, especially staging areas.

Support Sub-option C1

Support Sub-option C2.

Support Sub-option D2

#### 4.4 Rebuilding Plan

##### 4.4.1 Recruitment Assumption for Rebuilding Calculation

Support Option B

##### 4.4.2 Rebuilding Plan Framework

Support Option B

#### 4.6.2 Management Program Equivalency (Conservation Equivalency)

Support Sub-option B1-a

Support Sub-option C3

Support Sub-option D2

Support Sub-option E2

Thanks,



Will

**From:** [Dustyn Gabel](#)  
**To:** [Comments](#)  
**Subject:** [External] Comment for amendment 7  
**Date:** Thursday, April 14, 2022 10:09:32 PM

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My name is Dustyn Gabel and I am an avid surfcaster from the state of Pennsylvania. I chase the migration from Delaware through NJ into my and up to Massachusetts. Throughout my time surfcasting for striped bass I've gone from very basic tools to advanced technology. Increased catch once the fish is on the line but somehow I continue to catch less fish year after year. I know the fish stock is in decline and I would like to see more strict regulations or a moratorium. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Dustyn Gabel  
Bernville, Pennsylvania  
Email: [dustyngabel@yahoo.com](mailto:dustyngabel@yahoo.com)

[Sent from Yahoo Mail on Android](#)

**From:** [Matt Haeffner](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 9:55:51 PM

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To whom it may concern,

Frankly, it should concern anyone along the east coast. One of the most special gamefish to swim in the waters of the northeast Atlantic is in danger of becoming unavailable to generations to come. Recent years have shown a steady decline in the coastal migratory stock of striped bass, and whether mortality is more to blame on recreational release or commercial efforts, I do not know for certain... What I do know, is that I'm not alone in saying that the dissipation of these fish from our inshore environments over the years is evident, and unless immediate, strict action and enforcement are put into place to protect them on a coastal scale rather than a state management level, nothing will change and we'll lose these fish for generations to come.

I'm not going to act like I understand every single last detail of this massive document. To be quite honest, I think there's very few people who do; but as anglers and coastal citizens, we have a right to these fish. They were here far before us, and they're being depleted due to greed, mistreatment, pollution, overfishing, poor management, bad release practices and a list of 100 other hazards to their survival.

Not to sound selfish, but I don't want to be the part of a generation that stood by and allowed one of the greatest fisheries the United States has known (historically) fall by the wayside to greed and irresponsibility on behalf of government officials. I want my family to fish for striped bass for generations to come and be able to identify with the culture that these fish represent in the northeast U.S.

Respectfully, get it together and make the decision to effectively protect striped bass so their populations can rebound for years to come.

Thanks for your time and consideration.

Matthew Haeffner

Get [Outlook for iOS](#)

**From:** [Ellis Kalaidjian](#)  
**To:** [Comments](#)  
**Subject:** [External] RE: Atlantic Striped Bass Amendment 7 Public Comment Letter  
**Date:** Thursday, April 14, 2022 9:54:27 PM

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Dear Ms. Franke and Atlantic Striped Bass Management Board:

I am a recreational striped bass angler hailing from Rhode Island.

The value of striped bass cannot be understated. According to data collected by the National Oceanic and Atmospheric Administration (NOAA) from 2016, recreational fishing supported over 4,000 jobs and contributed over \$412 million to the Rhode Island economy. That's in comparison to a value of \$332 million for commercial fisheries. Of primary importance to me, the striped bass also has historical, cultural, and ecological value. My life has, in many ways, been shaped by having access to striped bass fishery.

I am very concerned about the ASMFC's ability as currently configured to manage the striped bass population in a sustainable manner. The striped bass recovery from the last moratorium demonstrates if we take care of the fish the fish will take care of us. ASMFC needs to look in the mirror and learn from the past.

I support the following options:

4.1

Tier 1

Option A- Support A1

Option B- Support B1

Option C- Support C1

Tier 2

Option A- Support A2

Option B- Support B1

Option C- Support C1

Tier 3

Option A- Support A2

Option B- Support B2

Tier 4

Support A

4.2

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Option B- Support B1-a

Option C- Support C3

Option D- Support D2

Option E- Support E2

Thank you for providing the public the ability to weigh in on a fisheries management decision of immense magnitude.

Sincerely,  
Ellis Kalaidjian

**From:** [Hunter Boll](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 9:53:36 PM

---

I am an avid salt water fisherman and particularly love fishing for stripers. I wholeheartedly support Amendment 7.  
Thank you.  
Hunter Boll

Sent from my iPhone

**From:** [Andrew Braker](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 9:43:42 PM

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To whom it may concern,

I am a angler, environmental steward, and a sustainability advocate. I grew up fishing the Chesapeake Bay watershed, and it is part of the reason I have developed to be the person I am today.

I am writing to support managing a future striped bass fishery that is managed in accordance with abundance.

I am recommending these specific motions moving forward.

#### 4.1 Management Triggers

##### Tier 1: Fishing Mortality (F) Triggers

Support Sub-option A1 (status quo)

Support Sub-option B1 (status quo)

Support Sub-option C1 (status quo)

##### Tier 2: Spawning Stock Biomass (SSB) Triggers

Support Sub-option A2

Support Sub-option B1 (status quo)

Support Sub-option C1 (status quo)

##### Tier 3: Recruitment Triggers

Support Sub-option A2

Support Sub-option B2.

##### Tier 4: Deferred Management Action

Support Option A (status quo): No Deferred Management Action.

#### 4.2.2 Measures to Address Recreational Release Mortality

Support option A. SQ

Support Sub-option C1

Support Sub-option C2.

Support Sub-option D2

#### 4.4 Rebuilding Plan

##### 4.4.1 Recruitment Assumption for Rebuilding Calculation

Support Option B

##### 4.4.2 Rebuilding Plan Framework

Support Option B

##### 4.6.2 Management Program Equivalency (Conservation Equivalency)

Support Sub-option B1-a

Support Sub-option C3

Support Sub-option D2

Support Sub-option E2

Thank you for your consideration.

Respectively,  
Andrew Braker



**From:** [Caleb Simms](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Thursday, April 14, 2022 9:37:33 PM

---

Subject line: Striped Bass Amendment 7 comments

To the ASMFC

My name is Caleb Simms, a resident of Cape Cod Massachusetts. This is my response to the request for public comments on Amendment Seven for the management of striped bass.

Listed below are my choices for each proposed regulation.

4.1

Tier 1

A1

B1

C1

Tier 2

A2

B1

C1

Tier 3

A2

B2

Tier 4

A

4.2

B- None

C1, C2

D2

4.4.1

B

4.4.2

B

4.6.2

B1-a

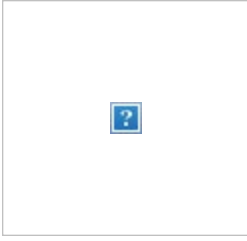
C3

D2

E2

These fish mean an incredible amount to me. Fishing for them is therapy, it is joy, it is a bond between generations in my family. I set my calendar around these fish. My wife says they are the other woman in my life. This is the resource we are protecting, not some meager value brought by the harvest of these fish. Both from the standpoint of emotional value and actual economic value, these fish are more valuable in abundance than barely surviving annual harvests. I plead for you to manage these fish to abundance so that more people may appreciate the joys of angling for these fish. Thank you for your time.

Sincerely,



Caleb Simms  
*Director of Construction*  
[csimms@outerland.co](mailto:csimms@outerland.co)  
c. 508.648.2296  
o. 508.477.4814

**From:** [peter.leary](mailto:peter.leary)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [2022stripercomments@gmail.com](mailto:2022stripercomments@gmail.com); [Emerson Hasbrouck](#); [Maureen Davidson](#); [James Gilmore](#); [CAROL HOFFMAN](#); [Sen. TODD KAMINSKY](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 9:34:37 PM

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Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board: Thank you for the opportunity to comment on Amendment 7 to the Interstate Fishery Management Plan for Atlantic striped bass.

Before I move to my comments, I would like to explain who I am and what this fishery means to me. I am a 26-year-old obsessed shore based Striped Bass fly angler and have grown this passion over the past 16 years. I am from Long Island and currently reside in NYC. I am all catch and release and believe the true value in a striper is as a gamefish and should be managed for abundance rather than yield. I first became obsessed with the Striped bass in the estuaries of Rhode Island as a child progressing to the Brooklyn based nocturnal fish chasing individual I am today. I plan on chasing stripers for the next 50 plus years. I spend thousands of dollars a year and most of my free time thinking, pursuing and preparing for Striped Bass just like many others. As I grow my family and the stresses of life ebb and flow I rely more on fishing as an outlet to keep sane and happy. The best meditation there is. The recreational striped bass fishery is an economic asset all along the coast that can grow exponentially with a healthy abundant striped bass population that is sustainably managed based on science. I fish for stripers approximately 100 days a year from mid-coast Maine to Southern New Jersey, 70% in NY, 15% RI and the rest in MA, ME and NJ. I have seen a steady decrease in the striper population and I believe more needs to be done to stop this population decline. Below I have broken down my comments.

## **Response Summary**

### **4.1: Management Triggers**

**Tier 1: Option A: A1 Option B: B1 Option C: C1**

**Tier 2: Option A: A2 Option B: B1 Option C: C1**

**Tier 3: Option A: A2 Option B: B2**

**Tier 4: Option A**

### **4.2.2: Measures to Address Recreational Release Mortality**

**Option B: I don't support any measure presented**

**Option C: I support both C1 & C2**

**Option D: D2**

**4.4: Rebuilding Plan**

**4.4.1: I support option B**

**4.4.2: I support option B**

**4.6.2: Management Program Equivalency**

**Option B: B1-a**

**Option C: C3**

**Option D: D2**

**Option E: E2**

**Issues and Reasoning**

I believe that with proper management on sound science the striped bass population can come back better then ever. I believe we need to minimize harvest of fish entering breeding class size and stop CE since it has been abused up and down the coast.

My views largely reflect those of the American SaltWater Guides Association who I proudly support! The document is far too complex for me to write about my reasoning for all of my choices. We need to save this fishery and I believe ASGA is leading the charge.

I would like to thank the Board for giving me the opportunity to provide my comments. I truly hope ASMFC seizes this moment and listens to the overwhelming support to save and rebuild the fishery for abundance.

Thank you,  
Peter Leary

**From:** [Bland, Jonathan](#)  
**To:** [Comments](#)  
**Subject:** [External]  
**Date:** Thursday, April 14, 2022 9:29:56 PM

---

Hello,

I'm a recreational fisherman in the mid-chesapeake bay. Striped bass are the species I grew up catching and my favorite species to target still today. I want the fishery managed for abundance, especially when it comes to large breeding class fish. Please find my comments below:

#### 4.1 Management Triggers

##### Tier 1: Fishing Mortality (F) Triggers

Support Sub-option A1 (status quo)

Support Sub-option B1 (status quo)

Support Sub-option C1 (status quo)

##### Tier 2: Spawning Stock Biomass (SSB) Triggers

Support Sub-option A2

Support Sub-option B1 (status quo)

Support Sub-option C1 (status quo)

##### Tier 3: Recruitment Triggers

Support Sub-option A2

Support Sub-option B2.

##### Tier 4: Deferred Management Action

Support Option A (status quo): No Deferred Management Action.

#### 4.2.2 Measures to Address Recreational Release Mortality

Support option A. SQ

Support Sub-option C1

Support Sub-option C2.

Support Sub-option D2

#### 4.4 Rebuilding Plan

##### 4.4.1 Recruitment Assumption for Rebuilding Calculation

Support Option B

##### 4.4.2 Rebuilding Plan Framework

Support Option B

#### 4.6.2 Management Program Equivalency (Conservation Equivalency)

Support Sub-option B1-a

Support Sub-option C3

Support Sub-option D2

Support Sub-option E2

Thank you for your time and consideration.

Sincerely,  
Jonathan Bland

**From:** [Michael Bryand](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 9:27:13 PM

---

ASMFC,

I'm writing to address my concerns and support of portions of Draft amendment 7. I have worked and fished the waters of Casco Bay, Portland Maine for 35 years. I have seen the rise and fall of the striped bass stock. I'm against CE. It has been the most misused management tool in this fishery. The fact that that a fish caught in the Chesapeake Bay have different regs then one caught in Casco Bay is a complete failure for conservation. We need to take the most conservative measures to rebuild the stock of striped bass. Lastly, My 14 son is hell bent on being a Maine Guide. My fear is he will not be able to live his life long dream. Please help conserve this fishery.

Best, Captain, Michael Bryand

**From:** [Alice Sedgwick](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 9:23:01 PM

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To Whom it May Concern:

I am sending this email in regards to Amendment 7 and the future of Striped Bass. Below are the options I believe will insure a healthy future population of Striped Bass:

#### 4.1 Management Triggers

TIER 1 OPTIONS: Fishing Mortality (F) Triggers

- Option A: Timeline to Reduce F to the Target
- Option B: F Threshold Triggers
- Option C: F Target Triggers

TIER 2 OPTIONS: Female Spawning Stock Biomass (SSB) Management Triggers

- Option A: Deadline to Implement a Rebuilding Plan
- Option B: SSB Threshold Trigger
- Option C: SSB Target Trigger

TIER 3 OPTIONS: Recruitment Triggers

- Option A: Recruitment Trigger Definition
- Option B: Management Response to Recruitment Trigger

TIER 4 OPTIONS: Deferred Management Action

-Option A (status quo): No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

#### 4.2 Recreational Fishery Management Measures

Option B. Effort Controls (Seasonal Closures)

Option B2. Spawning Area Closures sub-option B2-b. No-Targeting Spawning Closure Required

Option C. Additional Gear Restrictions Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

Sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

Option D. Outreach and Education

Sub-option D1: States would be required to promote best striped bass handling and release practices by developing public education and outreach campaigns. States must provide updates on public education and outreach efforts in annual state compliance reports.

#### 4.4 REBUILDING PLAN

##### 4.4.1 Recruitment Assumption for Rebuilding Calculation



Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

#### 4.4.2 Rebuilding Plan Framework

Option B: 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 recruitment assumption specified in Amendment 7) 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.

### 4.6 ALTERNATIVE STATE MANAGEMENT REGIMES

#### 4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option B.

##### Restrict the Use of Conservation Equivalency Based on Stock Status

Sub-option B1. Restrictions: CE programs would not be approved when Sub-option B1-a: the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

#### 4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option C.

##### Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals

Sub-option C3: CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30.

#### 4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option D.

##### Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries

Sub-option D3: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 50%.

#### 4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option E.

##### Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries

Sub-option E2: Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Thank you for taking the time to review this.

Best,

Alice Seals

**From:** [Madeline Moore](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 9:17:49 PM

---

To whom it may concern,

I'm a female angler in the mid-Chesapeake Bay area. Striped bass conservation is very important to me. I would like the fishery managed for abundance, with catch and release only restrictions put in place for large breeding-class fish. Please find my comments below:

#### 4.1 Management Triggers

##### Tier 1: Fishing Mortality (F) Triggers

Support Sub-option A1 (status quo)

Support Sub-option B1 (status quo)

Support Sub-option C1 (status quo)

##### Tier 2: Spawning Stock Biomass (SSB) Triggers

Support Sub-option A2

Support Sub-option B1 (status quo)

Support Sub-option C1 (status quo)

##### Tier 3: Recruitment Triggers

Support Sub-option A2

Support Sub-option B2.

##### Tier 4: Deferred Management Action

Support Option A (status quo): No Deferred Management Action.

#### 4.2.2 Measures to Address Recreational Release Mortality

Support option A. SQ

Support Sub-option C1

Support Sub-option C2.

Support Sub-option D2

#### 4.4 Rebuilding Plan

##### 4.4.1 Recruitment Assumption for Rebuilding Calculation

Support Option B

##### 4.4.2 Rebuilding Plan Framework

Support Option B

#### 4.6.2 Management Program Equivalency (Conservation Equivalency)

Support Sub-option B1-a

Support Sub-option C3

Support Sub-option D2

Support Sub-option E2

Thank you for your consideration.

Madeline Moore

**From:** [salty123456@aol.com](mailto:salty123456@aol.com)  
**To:** [Comments](#)  
**Subject:** [External]  
**Date:** Thursday, April 14, 2022 9:10:11 PM

---

I am in favor of status quo for striped bass . Our clients pump a lot of money into the economy not only fishing on our boats but buying gas ,restaurants , tackle shops etc. to shut down the striped bass fishery would be another nail in the coffin.sincerely Bob Wadsworth owner of the Sunbeam fleet Waterford Ct.

**From:** [Matt Jacobus](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7  
**Date:** Thursday, April 14, 2022 9:02:35 PM

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To the Advisors and Board members of the Atlantic States Marine Fisheries Commission,

My name is Matthew Jacobus and I have lived on the North Shore of Massachusetts for the past 5 years. Especially over the past two years, I have come to absolutely love fishing for striped bass and do so regularly over the course of each spring, summer, and fall primarily via kayak.

I will admit, when I first started to seriously fish for stripers in my area two years ago, I couldn't wait to catch a "slot" fish and fill my chest freezer with fillets. I found out that a colleague of my wife caught a 42 incher on a bay-facing beach only 1/4 mile from my house! What I didn't realize until later is that was many years ago, that there were no more 40-inch class fish prowling the waters of the Salem Harbor or the rivers/estuaries that used to produce trophy class fish, and that a catching a trophy fish in "broad daylight" was a near impossibility without a boat to run-and-gun to bunker blitzes outside of Boston Harbor. I fished my ass off that first year and managed to catch a single "slot" fish, which I promptly released to live another day and hopefully (prolifically) spawn in a few years.

My entire attitude changed once I connected to the community of recreational striped bass anglers. I started pinching my barbs and using only single hook lures. But... I could sense that this was not an optimistic bunch on the future of our favorite fish. Deep down, we all know that we will need to find another species to fish for in a few years. I have caught 2 bluefish over the past two years compared to ~700 stripers, so without the stripers, I'm just not sure why I will feel compelled to leave my family at home and drag my kayak to the launch at 4 am.

I love migratory striped bass and I am encouraged by this amendment and the amazing community of saltwater fisherman that are committed to striped bass conservation. I hear the stories of the heyday of the early 2000's and hope and pray that the fishery can rebound so that my sons (now 2 and 6) have a chance at those back bay stripers before I send them off to college.

With all of this said, I wish to support the following options in the current Amendment 7 draft:

On 4.1 Management Triggers, I support:

Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality

Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold

Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions

Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, I support:

Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method

Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, I support:

Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. We recognize this option may require more restrictive management measures than option A, which we support

On 4.4.2 Rebuilding Plan Framework, I support:

Option B to allow the Board to take direct management actions as well as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, “Management program equivalency (also known as “conservation equivalency” or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

I believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically, I support:

Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level

Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates

Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries

Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

- Matthew Jacobus (Marblehead, MA)

**From:** [colods3@gmail.com](mailto:colods3@gmail.com)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 9:01:43 PM

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ASMFC,

I am writing you to express my grave concern with the management and health of the Atlantic striped bass stock. I am asking that you implement the long overdue and required changes to protect these fish and our fishery so that we have a resource moving forward. Under current rules and regulations, we surely will not. Now is the time to step up so this fish and the peoples who's lives depend on them have a future.

Thank you for your work and consideration.

Stephen Colodny

**From:** [Sof Gmail](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 8:57:03 PM

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Hello, my name is Sof. I am a surfcaster from Long Island and I love fishing for striped bass. I have not kept a fish in many year - stripers are extremely important fish and we need a rapid rebound of the population so my children can enjoy this incredible fishery.

Thanks,  
Sof

**From:** [Jack Deasy](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 8:56:34 PM

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ASMFC,

I am writing you to express my grave concern with the management and health of the Atlantic Striped Bass stock. I am asking that you implement the long overdue and required changes to protect these fish and our fishery so that we have a resource moving forward. Under current rules and regulations, we surely will not. Now is the time to step up so this fish and the peoples who's lives depend on them have a future.

Thank you for your work and consideration.

Jack

--

Jack Deasy  
914-400-7564  
[JackHDeasy@gmail.com](mailto:JackHDeasy@gmail.com)



**From:** [Evin Blatt](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 | Striped Bass  
**Date:** Thursday, April 14, 2022 8:36:43 PM

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ASMFC,

I am writing you to express my grave concern with the management and health of the Atlantic striped bass stock. I am asking that you implement the long overdue and required changes to protect these fish and our fishery so that we have a resource moving forward. Under current rules and regulations, we surely will not. Now is the time to step up so this fish and the peoples who's lives depend on them have a future.

Thank you for your work and consideration.

Evin

Sent from my iPhone

**From:** [Levi Opsatnic](#)  
**To:** [Comments; stripercomments@gmail.com](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 8:36:40 PM

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Hello,

My name is Levi Opsatnic and I consider the striped bass to be an incredibly important part of my life, an incredibly important fish to the general public, and an incredibly important fish in the places that morone saxatilis calls home. I've been catching and releasing striped bass for the majority of my life and to see the state that the fishery is in right now is a combination of disappointing, sad, and straight-up alarming. I live in Portland, Maine--a place where I decided to reside largely because of its presence of striped bass, but I fish for this wonderful species all around the eastern Atlantic. At the age of thirty, I can say that I love this activity and my life wouldn't be the same without it, but I can also confidently say that this fishery needs help and needs help fast.

I want to provide my thoughts on Amendment 7 below, and I strongly urge that my decision be taken into consideration and the goal of rebuilding our bass is met as soon as possible.

On 4.1 Management Triggers, I support:

Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality

Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold

Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions

Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, I support:

Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method

Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, I support:

Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. I recognize this option may require more restrictive management measures

than option A, which I support

On 4.4.2 Rebuilding Plan Framework, I support:

Option B to allow the Board to take direct management actions as well as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, "Management program equivalency (also known as "conservation equivalency" or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management."

I believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically, I support:

Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level

Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates

Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries

Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

I appreciate the opportunity to make these comments and the time it takes to read them. Amendment 7, its progress, and striped bass management as a whole are things that I will be very closely monitoring and am really hoping for the best outcome with it

Thank you for your time,

Levi Opsatnic

**From:** [patrick.garland](#)  
**To:** [Comments](#)  
**Cc:** [2022stripercomments@gmail.com](mailto:2022stripercomments@gmail.com)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Thursday, April 14, 2022 8:35:46 PM

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My name is Patrick Garland from East Greenwich, Rhode Island and I am responding to the request for public comments on Amendment Seven for the management of striped bass.

Here are my choices for each proposed regulation.

4.1

Tier 1

A1

B1

C1

Tier 2

A2

B1

C1

Tier 3

A2

B2

Tier 4

A

4.2

B- None

C1, C2

D2

4.4.1

B

4.4.2

B

4.6.2

B1-a

C3

D2

E2

I am deeply concerned with the state of the striped bass fishery, and I urge you to act swiftly to protect this priceless resource. The loss of this fishery would be a catastrophe for local businesses, tourism, charters, tourism etc. for the entire east coast. I hope we can all agree to do the right thing for the preservation of this species. Regards,

Patrick

**Patrick M. Garland**

**From:** [Ian Blythe](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 8:20:58 PM

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Hello,

I am writing in the hopes that my thoughts will be heard ahead of the impending decision regarding Draft Amendment 7. I have detailed below my stance on some of the options proposed and hope that they will be read and considered before any decision is made final.

It is my hope that we can begin to restore the striped bass population to health and vitality so that others can continue to enjoy this natural resource for years to come.

Best,  
Ian

#### **4.1 Management Triggers**

*Tier 1:* I support sub-options A1, B1 & C1

*Tier 2:* I support sub-options A2, B1 & C1

*Tier 3:* I support sub-options A2 & B2

*Tier 4:* I support option A

#### **4.2.2 Measures to Address Recreational Release Mortality**

*Option C:* I support sub-options C1 & C2

*Option D:* I support sub-option D2

#### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

I support Option B

#### **4.4.2 Rebuilding Plan Framework**

I support Option B

#### **4.6.2 Management Program Equivalency**

*Option B:* I support sub-option B1-a

*Option C:* I support sub-option C3

*Option D:* I support sub-option D2

*Option E:* I support sub-option E2



**From:** [Jordan Brainson](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Ammendment 7  
**Date:** Thursday, April 14, 2022 8:20:08 PM

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Hi my name is Jordan Brainson and I'm a recreational fisherman. I remember as a young kid going out on my dad's boat. He would take me around to various bays and estuaries so I could cast and troll for striped bass. This is something I want all kids to have the chance to be able to take part in as well. If the population of striped bass continues to decline, it will be very difficult for future generations to enjoy the fishery like I have. I got back into fishing in 2017 and fishing for stripers was great that year. Fast forward to 2022 and I can say without a doubt that the population has taken a huge hit and the species is in a severe decline. Each year I've seen a noticeable decline in the population since I got back into fishing in 2017. Steps need to be taken to ensure a healthy population for the future. Striped bass are a very valuable resource and should be treated as such. I support stricter restrictions on striped bass to help the population recover and thrive like it should. I support the following options:

#### Tier 1

Option A - Support A1  
Option B - Support B1  
Option C - Support C1

#### Tier 2

Option A - Support A2  
Option B - Support B1  
Option C - Support C1

#### Tier 3

Option A - Support A2  
Option B - Support B2

#### Tier 4

Support A

#### 4.2

Option B - Support no measure  
Option C - Support C1, C2  
Option D - Support D2

#### 4.4.1

Support B

#### 4.4.2

Support B

#### 4.6.2

Option B - Support B1-a  
Option C - Support C3  
Option D - Support D2  
Option E - Support E2



Thanks for the opportunity to comment. Striped bass mean a lot to me and many others and I hope the proper steps are taken to rebuild the fishery.

Jordan Brinson

**From:** [Curtis Fortier](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7 public comment  
**Date:** Thursday, April 14, 2022 8:19:20 PM

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Good afternoon,

I am writing in to share my thoughts on the upcoming Amendment 7. For ease of reference, I've provided my positions on each section of the amendment at the bottom.

As a lifelong Mainer, I grew up fishing for, eating and admiring striped bass. When I was in high school I worked for a local tackle shop that supplied sport fishermen and guides alike. Here, I saw the true value of these fish to Maine's economy, and our identity as Mainers. It is absolutely imperative that we manage these fish as a valuable renewable resource. This includes listening to our biologists and managing the fisheries and ecosystems that they rely on. In my opinion this should be managed in a way that mirrors the Federal Waterfowl program. Here, we take into account not only the population and environment in one location, but the habitats up and downstream of the migration as well. As a conservationist, anglers are willing to participate in more conservative regulations and pay more fees if it means funding a program that will make a positive impact on the striped bass population on the East Coast.

#### 4.1 Management Triggers

Tier 1: Fishing Mortality (F) Triggers

Position: Timeline to Reduce F to the Target

Tier 2: Spawning Stock Biomass (SSB) Triggers

Position: **Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

Tier 3: Recruitment Triggers

Position: **Sub-option A2:** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA) shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

Tier 4: Deferred Management Action

Position: **No Deferred Management Action**

#### 4.2.2 Measures to Address Recreational Release Mortality

**Position: Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

#### 4.4 Rebuilding Plan

##### 4.4.1 Recruitment Assumption for Rebuilding Calculation

**Position: Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

#### **4.4.2 Rebuilding Plan Framework**

**Position: Option B:** 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 recruitment assumption specified in Amendment 7) 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.

#### **4.6.2 Management Program Equivalency (Conservation Equivalency)**

**Position: Sub-option B1-a:** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

Thank you,

Curtis

**From:** [Nick Antonelli](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment 7  
**Date:** Thursday, April 14, 2022 8:10:06 PM

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My name is Nicholas antonelli and I am 24 years old. I have been surfcasting since I was 6 years old with my father who has been surfcasting for over 25 years. Since I started fishing years ago I have seen the fishery decline insanely. If something is not done to change this the future is not looking bright for striped bass. Years ago bass were plentiful of all sizes and found in many local spots. Now I will fish for nights on end and not even get a bite. My goal in life is to be able to take my future kids fishing like my father did with me and I'm afraid if action is not taken I will never be able to experience the fishing I did with my father.

Sent from my iPhone

**From:** [Kylecannistraro Cannistraro](#)  
**To:** [Comments](#)  
**Subject:** [External] Comment for Amendment 7  
**Date:** Thursday, April 14, 2022 8:07:59 PM

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My name is Kyle Cannistraro and I am an avid surfcaster from the state of Massachusetts. I would like to be able to share my passion for striped bass with my daughters in the future. I would hate to see this beautiful fish become extinct. Recreational fishing not only provides families like mine with opportunities to spend time together outside doing something we love but it also provides thousands of jobs and millions of dollars into the economy. The striped bass recovery from the last moratorium proves that if we take care of the fish the fish will take care of us. The striped bass population needs to be protected for the future generations. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Kyle Cannistraro  
Marlborough, Massachusetts  
Email: [kylecannistraro.kc@gmail.com](mailto:kylecannistraro.kc@gmail.com)

**From:** [Eric Hellberg](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Draft Amendment 7  
**Date:** Thursday, April 14, 2022 8:03:25 PM

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My name is Eric Hellberg I am from Pennsylvania. I have been striped bass fishing for over 25 years. I travel all over the east coast to catch striped bass, it is my passion. Striped bass are important to me, it's important to me that we protect this resource and ensure it's there for future generations of striped bass fisherman to responsibly enjoy. As a well traveled striped bass angler it is very clear to me the striped bass population is smaller and it is overfished and over harvested. We must do better to prevent a total collapse of this amazing fish.

I support 4.1

Tier 1

Option A - Support A.1

Option B - Support B.1

Option C - Support C.1

**From:** [Edward Teufel](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 8:00:41 PM

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To the commission,

I would like to express my support for several parts of amendment 7 to save the striped bass fishery of New England. I have been fishing for striped bass here in Maine since I moved here 23 years ago. My kids grew up fishing for bass, and for each of them a striper was the first fish they caught (including my daughter at age 6 with her Barbie fishing rod!). The striped bass holds a very special place in our family, with many good times on the water. Watching this fishery suffer in the last few years has been frustrating.

I support more aggressive measures to help support the fishery and return to the early 2000's, including:

4.1 Sub option A1, B1, and C1

4.2 Option B 2-b - complete closure of targeting fish in spawning areas during the spawn is vital to rebuild the stock. This has been shown in other times and areas for stripers and certainly for trout as well.

4.6 - I support the strictest use of conservation equivalency. Ideally this should be removed, but if not then strict management of its minimal use should be followed.

Thank you for our time. I hope we can all work together to support the striped bass and bring the population back to where it was so that my kids can create new memories of striper fishing in Maine with their kids someday.

Sincerely,

Edward J Teufel



**From:** [Charles Foster](#)  
**To:** [Comments](#)  
**Subject:** [External] KAF Comments on Draft Amendment 7  
**Date:** Thursday, April 14, 2022 8:00:30 PM

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Dear Ms. Franke,

As a striped bass angler, I support balancing precautionary management with regulatory stability and reasonable access to the fishery. To achieve that, I support the following options

Please go back to 1 fish 36 inches. Skip the slot and ban the charters going out and killing 12 or more 30-38 inch fertile fish. Twice a day!!

We got them back at 36 inches and charters now we see poor reproduction and disease reducing the future. ACT NOW - reduce commercial licenses also. Practice catch and release - circle hooks with bait - I only fly fish ! Save them by going back to lower mortality !

Yes I read the whole 149 pages! Partial closure? Forget that notion.

And as for bluefish - stop the raiding of 4 inch blues by the dozen for cocktails. And stop gaffing them because your afraid of the teeth!

Management Triggers:

Fishing Mortality Triggers:

Timeline to Reduce F to the Target, I support Sub-option A1 (status quo) 1 year.

F Threshold Trigger, I support Sub-option B1 (status quo) If F exceeds the threshold in a single year, action must occur to reduce F to the target within timeframe selected under sub-option A (supported A1 above).

F Target Trigger, Support Sub-option C1 (status quo) if F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, must reduce F to a level that is at or below the target within the timeframe selected under sub-option A (supported A1 above).

Spawning Stock Biomass Triggers

Deadline to Implement a Rebuilding Plan, I Sub-Option A2: Two-Year Deadline

SSB Threshold Trigger, I support Sub-option B1 (status quo) Rebuild when SSB in a single year falls below the threshold.

SSB Target Triggers, I support Sub-option C3. No management trigger related to SSB target because F target trigger also has an SSB target component and managers directly control F.

Recruitment Triggers

Recruitment Trigger Definition, I support Sub-option A2: Moderate Sensitivity Recruitment Trigger.

Management Response to Recruitment Trigger, I support a variation of Sub-option B2. The Board use an interim F target calculated using the low recruitment assumption and then during the next stock assessment it evaluates F against the new interim F target and simultaneously evaluates all the other management triggers to determine if action is needed.

Deferred Management Action, I support Option A. No deferred management action. Stock assessments following a management change should be scheduled to enable evaluation of two fishing years under the new management measures providing an opportunity for the population to react to the corrective management action while creating management stability for at least two years.

Measures to Address Recreational Release Mortality

Seasonal closures, I support Sub-options B2 Spawning Area Closures.

Gear restrictions, I support Sub-options C1 and C2.

Outreach and Education, I support Sub-option D1. States are required to promote best striped bass handling and release practices by developing campaigns.

Recruitment Assumption for Rebuilding Calculation, I support Option B. Use a low recruitment assumption for the 2022 stock assessment.

Rebuilding Plan Framework, I support Option B. Enable ASMFC to respond quickly through Board action.

Management Program Equivalency, I support Sub-options B1-A and B1-C, C3, and D1.

Thank you for the opportunity for allowing me to share my thoughts on this important issue.

Sincerely,

Charles Foster  
35B E MAIN ST  
WESTBOROUGH, MA 01581  
chcfsalsr@gmail.com

**From:** [Aaron Barmmer](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped bass  
**Date:** Thursday, April 14, 2022 7:59:39 PM

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Hello. I am a avid striped bass fisherman from cape cod Massachusetts. I have seen a incredible decline of striped bass over the past 6 years. These fish must be better protected and regulated or else they will be whipped out. They are a incredible resource to my local economy and community alive and swimming. Gas , food, charter, tackle just to name a few. Striped bass the the most important fish in America. Thank you and hopefully amendment 7 is a success and this incredible fish is better protected before it's too late.

I support:

4.1

Option A- support A1

Option B - support B1

Option C - support c1

Sent from my iPhone

**From:** [Nick Whitbeck](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Ammendment 7  
**Date:** Thursday, April 14, 2022 7:56:59 PM

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To the valued members of the ASMFC,

I hope this email finds you well, along with hundreds if not thousands of similar ones from other concerned members of the fishing community. Years are passing with little to no effective regulatory changes, while conservation efforts are only growing amongst the angling community. Hopefully this is the year a positive shift occurs for our beloved striped bass fishery. My name is Nick Whitbeck and I am an avid surf fisherman for over 20 years. More importantly I am a manufacturer of fishing lures focused on the northeast region and primarily the striped bass species. I decided from the beginning that an important aspect of this company would be striped bass conservation. Having a recreational anglers mindset, I found the easiest way to involve this company in conservation was to utilize inline single hooks. My company exclusively uses inline singles on all of the products offered. I believe it to be my responsibility to do this as someone who firmly agrees with the protection of the striped bass. I feel strongly more businesses should adapt this model of inline single hook use but without any regulations to encourage this, it is unlikely to ever happen.

I will leave the policy debate to those who are most informed and have the striped bass' best interest at heart. I am humbled to know many members of the conservation community and have been amazed at its growth in just a few years. Please see this increased support as a sign that something needs to be done sooner rather than later. I am excited to see what tomorrow has to bring.

Best,

Nicholas Whitbeck  
Island X Lures

**From:** [Pj Dimartino](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped bass fishery  
**Date:** Thursday, April 14, 2022 7:47:39 PM

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The regulations for these fish need to be changed for the better!!!!

**From:** [Tim Sanchez](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 7:41:24 PM

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Timothy Sanchez  
221 West Euclid Ave  
Haddonfield, NJ, 08033

14 April 2022

Emilie Franke [comments@asmfc.org](mailto:comments@asmfc.org)  
FMP Coordinator  
Atlantic States Marine Fisheries Commission  
1050 N. Highland Street, Suite 200 A-N  
Arlington, VA 22201

Dear Ms. Franke,

Thank you for considering my public comment about the Draft Amendment 7 to the Interstate Management Plan for the Atlantic Striped Bass.

I am 25 years old and have fished for Striped Bass from the surf since I was 10. I am not an avid surfcaster and I only fish for Striped Bass a few times each year; I mainly enjoy surfcasting for Striped Bass because it's my father's passion and I enjoy spending time with him. But in the last 10 years the catch has been getting worse and worse as the fish are depleted.

It is important that we protect and return the population of Striped Bass to good health as quickly as possible. When I have children of my own, I'd like for them to discover Striper fishing and experience it with me and my father. If they come to love the sport as my father does, I want to ensure that there are Striped Bass for them to catch.

I support the following Draft Amendment 7 options below:

**4.1 Management Triggers:**

Tier 1-Fishing Mortality Management Triggers

- Option A1
- Option B1
- Option C1

Tier 2-Female SSB Management Triggers

- Option A2
- Option B1
- Option C1

Tier 3-Recruitment Triggers

- Option A2
- Option B2

Tier 4 Deferred Management Action

- Option A

**4.2.2 Recreational Release Mortality**

- Option B-2a
- Option C1
- Option C2
- Option D2

#### **4.4.1 Rebuilding Plan**

- Option B: Use low recruitment regime assumption

#### **4.4.2 Rebuilding Plan Framework**

- Option B

#### **4.6.2 Management Program Equivalency**

- Sub-Option B1a
- Sub-Option B2b
- Sub-Option B1c
- Sub-Option C3
- Sub-Option D3
- Sub-Option E2

Thank you again for your kind consideration.

Timothy L Sanchez

## Timothy Sanchez

| **Dispatcher** | *Mustang Expediting, Inc.*

[tim@mustangexpediting.com](mailto:tim@mustangexpediting.com) | 35 Stanley Drive | Aston, PA 19014

610-497-6360 x122 | [www.mustangexpediting.com](http://www.mustangexpediting.com)



**From:** [Matthew Feldman](#)  
**To:** [Comments; stripercomments@gmail.com](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 7:26:41 PM

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Dear ASMFC,

My name is Matthew Feldman, a year round resident of Hampton Bays, New York. A small fishing village on the eastern tip of Long Island.

Hampton bays is surrounded by the Atlantic Ocean to the south as well as shinnecock bay to the south, east and west. To the north lies Peconic bay. All of these waterways connected by the shinnecock canal.

This habitat of canals and waterways is absolutely prime territory for striped bass. For close to 8 months of the year the prized striped bass take up residence in this sleepy town and should be plentiful up and down the entire coast.

Striped bass fishing is my favorite hobby and for 32 years of my young life I have truly never had the privilege of witnessing a healthy striped bass fishery. Stories of giant bass, plentiful in years past are now just myths or boat fisherman fodder.

Please restore the striped bass fishery to what it once was and save this mighty American creature from sure extinction. This fish is worth more alive than dead in every state included in the ASMFC. The rebound of the striped bass population would be especially uplifting in these post Covid times we are living in. I urge you to take absolute urgency in this matter and adopt the strictest conservation measures possible to save this incredible creature.

Urgently and respectfully,

Matthew Feldman

Email: [Matthewfeldman44@gmail.com](mailto:Matthewfeldman44@gmail.com)  
Cell: (516)238-6451



**From:** [Jason Taylor](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 7:24:45 PM

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Hello Gentlemen,

I am writing to you as a citizen with the utmost concern due to the critical timing surrounding the protection of the Atlantic Striped Bass population.

I am writing to you today as a Pennsylvanian dedicated to preserving our Commonwealth's natural resources.

I am writing to you today as an obsessed angler that revels in the enlightening experiences and fellowship this mystical species has provided me for decades.

I am writing to you today as a father, fearful that my son will not have the opportunity to enjoy these traditions and pass them along to others.

I am writing to you today on behalf of Striped Bass.....

You have the chance to shape the future of the fishery for decades to come and create a culture of conservation for future generations.

Please act in a swift manner adhering to the guidelines that have been set in order to keep a viable population of this species moving forward.

**SOMETHING NEEDS TO BE DONE NOW!**

Thank you for your time and dedication.

All the Best,

Jason Taylor

**From:** [Top Hook](#)  
**To:** [Comments](#)  
**Subject:** [External] Stripedbass  
**Date:** Thursday, April 14, 2022 7:21:30 PM

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AMENDMENT 7, ASMFC 8 YEARS BEHIND REBUILDING. LETS SEE ,WAITING FOR STOCK ASSESSMENT.

THANK YOU  
STEVE W.

**From:** [Pat Gallagher](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass comments  
**Date:** Thursday, April 14, 2022 7:15:38 PM

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I'm a charter captain and you will be killing a very valuable industry here in the Hudson River. So many captains, baitshops and marina owners that will be unnecessary crippled from a closure in the Hudson. We sacrificed back in 2015 as the only fishery with slot limit pilot program and in the last few years fishing has been phenomenal! Not only quantity but also quality if all those big breeder fish being released to complete spawn but also returning year after year with much improvement size classes. We see absolutely blackout screens of 30fow in water column of solid fish! We are the example all other spawning grounds should be utilizing, they waited for too long to implement breeder protection in the Chesapeake along with the ramped raping of bunker by Omega Protein. How much Striper by catch is honestly just needlessly killed because of those daggers? Stripers and Bluefish are in those schools of bunker!

If you feel more stringent conservation is needed it needs to be in those regional fisheries that failed to get ahead of it in the Hudson River. I also fish Montauk and do very well, never get skunked and catch 30-50+ pound bass with regularity. Some trips multiple 50's come over the rails.

Migration patterns due to warming water is an issue with your data and is not accounted properly. What about the metric tons of Strioers found in Nova Scotia last year that is historically not Striper Migration travels.

Do not close the Hudson River Fishery!

Captain Pat Gallagher  
845 532 7461  
Tippin'Scales Charters

Make vtr reports mandatory for River Charters and you will get a much better perspective on health of fishery like in marine waters is required. Foolish its not done seeing you only do a 4 year stock assessment... I caught nearly 1000 fish in 6 weeks of Hudson River Charter season. Have biologists cone aboard my boat for tagging, I'll show you! Not one fisherman locally is saying the Hudson is in bad shape but has been in an ever improving motion last few years. Caught 20 over 40" and also a 54# monster safely released.

**From:** [Patrick Rose](#)  
**To:** [Comments](#)  
**Subject:** [External] Subject: Draft Amendment 7  
**Date:** Thursday, April 14, 2022 7:12:50 PM

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To whom it may concern,

While growing up on Cape Cod, fishing for striped bass was a legacy pastime of my family's for multiple generations. Fishing with my father, grandfather, and multiple other generations of anglers set about a lifetime-long love the outdoors, angling and conservation. All centered around the striped bass. It's hard for me to express in words how profoundly disappointed I am in the management of this species. Not only have we turned a blind eye to declining numbers we have done so by allowing the commercial interests to prevail. We're literally biting the hands that feeds us.

Please allow for this letter to serve as a plea. I support any measure that needs to be taken to ensure that return of the striped bass population to healthy and prosperous numbers. Now is the time for impose no-kill management tactics and whatever else is needed to assure that we don't allow this egregious mismanagement to continue. I stand with the members of stripers forever and all other special interest groups whose mission is to protect this species.

-Patrick Rose

**From:** [Cam Whitney](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] SAVE OUR FISH  
**Date:** Thursday, April 14, 2022 7:06:53 PM

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The striped bass is the fish of the people. It's everyone's fish, except for the people who choose to harvest every day. This fish is simply so much more than a simple meal. Eat a sea bass, haddock, bluefish, scup, tautog, or simply anything else. The striped bass is too important to be used for table fare only. It has supported my family's business for 40 years and I hope and pray it will hold on so that I can support my family thanks to this fish. This fish can be caught on top water, surfcasting, fly, live bait, chunkbait, and so much more. It really is a fish for the people. There is simply no reason to not protect these fish the best we can. Please I beg you save our fishery.

Do the right thing!

**From:** [Mike Dibenedetto](#)  
**To:** [Comments](#)  
**Cc:** [Michael Armstrong](#); [Rep. Sarah K. Peake](#); [RICK\\_JACOBSON@FWS.GOV](#); [Dan Mckiernan](#); [Raymond Kane](#); [Stripercomments@gmail.com](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 6:59:51 PM

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Hi I'm Mike from Massachusetts striped bass are not only important to me they are import to the communities all along the coast.it is critical we put striped bass on the road to recovery therefore I support the following options and thank you for our opportunity to be heard

4.1

Tier 1

Option A support A1

Option B support B1

Option C support C1

Tier 2

Option A support A2

Option B support B1

Option C support C1

Tier 3

Option a support A2

Option B support B2

Tear 4

Support A

4.2

Option B support no measure

Option C supportC1 C2

Option D supportD2

4.41

SupportB

4.4.2

Support B

4.6.2 option B support BI-a

Option C support C3

Option D support D2

Option E support E2

Once again I appreciate the opportunity to make an impact on saving the striped bass future

Sent from my iPhone

**From:** [John Scola](#)  
**To:** [Comments](#); [Dan Mckiernan](#); [Raymond Kane](#); [Sarah.Peake@mahouse.gov](#); [Sarah Ferrara](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7 comments  
**Date:** Thursday, April 14, 2022 6:56:33 PM

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Thanks for bringing this to my attention. I started fishing for stripers at 6 years old off the beaches of Long Island Sound with my dad. Now I fish for stripers from the north shore of Massachusetts, and have raised my 3 boys on the arts of fishing and more importantly conservation. I take maybe 2-3 stripers home each year, otherwise I'm 100% catch and release, even for slot fish. I've been fishing the MA waters for the last 20 years and have seen great and poor fishing seasons. As someone who generally focuses on catch and release, the idea of the slot 28 - 35" was very much appreciated.

I'm all for smart regulation and enforcing that regulation. Regulation without enforcement = no regulation, and this might be a great place for the Striped Bass Board to focus first. With that said, I'd like to focus my comments to Amendment 7:

#### Management Trigger

There should absolutely NO delay in taking action. If your car is running out of gas, do you wait for a few more hundred miles (btw - you ran out of gas after 50 miles) to pass by to fill up, or do you fill up ASAP. Come on folks, let's take action and address the problem before it gets worse. No one wants to be on the side of road with no gas. This goes across the board - I'm in support of ASGA's proposal

#### Recreational Release Mortality

Sub-option B2-b - agreed we should not be fishing when fish are spawn. I'm actually appalled that some fishermen would even consider that fishing. Please identify when and where the fish are spawning, document and close it down during those periods.

Sub-option C1, C2 - do anglers really use gaffs for bringing onboard stripers? If so, lethal devices for removing fish should be banned.

I use a net, the fish seem quite happy with the net vs any other method.

#### Rebuilding Plan

4.4.1 Support for Option B

4.4.2 Support for Option B...again, lets take action as soon as we know that action is needed. Why wait?

#### Management Program Equivalency

4.6.2 Support for Sub-option B1-a...we don't need flexibility - we need consistent enforcement

Support for Sub-option C3...data is critical, a >30% standard error is unacceptable for any measurement...not just fish

Support for Sub-option D2...first CE should not be used, but if it is, let's protect ourselves with a 25% uncertainty buffer

Support for Sub-option E2...again enforcement should be the focus here, but without that, lets focus on aligning reduction with harvest, thus at the state specific level.

May our fish stocks remain plentiful and we maintain an activity for generations to enjoy.

Thanks  
John

**From:** [Jerry](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 6:41:42 PM

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I've been fishing for 60 years and seen the good and bad times of stripers. I am still evaluating the suggestions in the Striped Bass document, I fully support and recommend a season from Jan 1 to June 1 where they can **NOT** be kept. A catch and release program using circle hooks only. Here in NJ we can keep them at certain areas all of March and some females are being caught and kept. Below the Salem River they can be kept. This has to change. Lack of law enforcement funding for more officers contributes to many undersize fish being kept illegally. The June 1 opening might need to be area tweaked as the New England area has a different situation then us.

Respectfully submitted,

Jerry Ray  
16 Holly Place  
Gibbstown, N.J. 08027



**From:** [Jon Piasecki](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass management  
**Date:** Thursday, April 14, 2022 6:41:17 PM

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Dear Regulators

I am an avid saltwater fisherman who loves Striped Bass.

Please consider closing the commercial Striped Bass fishery along the entire Atlantic coast, until the population rebounds.

Please consider closing the spring fishery in the Hudson River and the Chesapeake Bay where breeding females are targeted.

Please consider closing the Cape Cod Canal to all fishing at all times, both commercial and recreational until the population rebounds.

Please consider limiting the recreational take to one fish per season no larger than 30" and no smaller than 28".

Please consider a moratorium on the commercial harvest of Menhaden, until the Striped Bass population rebounds.

Please consider authorizing a Seal harvest annually to reduce seal numbers to half of their current level.

Thank you for your efforts.

Jon Piasecki

P.O. Box 808  
Housatonic, MA  
01236

--

Jon Piasecki  
ASLA, FAAR

[jon@goldenbough.net](mailto:jon@goldenbough.net)  
[www.goldenbough.net](http://www.goldenbough.net)  
413-274-6243 work

**From:** [Thomas Nethercott](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 6:26:05 PM

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To whom it may concern,

I'm writing you to beg you to enforce stricter regulations when it comes to the striped bass fishery. It has been evident for years that striped bass numbers are declining rapidly and that law makers do not have the fishery's best interests in mind.

Aside from commercial fishermen, I haven't heard from anyone that wouldn't support stricter regulations. This community needs to understand that without change, there will be no future.

Thank you,

Thomas Nethercott

**From:** [Joshua K. Wrigley](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7 - Striped Bass  
**Date:** Thursday, April 14, 2022 6:24:46 PM

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Dear ASMFC Commissioners,

I would like to submit public comment in regard to striped bass Draft Amendment 7.

I believe that the ASMFC should take management action under Draft Amendment 7 to rebuild the striped bass stock as quickly as possible with the strongest management actions and the surest possibility of success.

Below is a list of the management actions that I believe the Commission should take:

#### **4.1 Management Triggers**

##### **Tier 1 - Fishing Mortality Triggers**

Option A/Sub Option A1 - Reduce fishing to a level at or below the target within one year.

Option B/Sub Option B1 - If the F target is exceeded, management must adjust to reduce F.

Option C/Sub Option C1 - Again, if F exceeds its target, it must be readjusted within the timeframe selected under Option A. Female SSB is very important to continue building the stock.

##### **Tier II - SSB Mgmt Triggers**

Option A/Sub Option A2 - It's important to implement a rebuilding plan as fast as possible and the two-year deadline would serve this.

Option B/Sub Option B1 - Don't change the status quo. The management plan should be adjusted according to the timeframe if female SSB drops below the target level.

Option C/Sub Option C1 - Again, don't change the status quo that requires the timeline for rebuilding female SSB.

##### **Tier III - Recruitment Triggers**

Option A/Sub Option A3 - It's important to have a high sensitivity trigger rather than a standard that would allow the stock to continue to diminish.

Option B/Sub Option B2 - Under this option, the Commission would implement a different F target if the recruitment trigger is activated.

##### **Tier IV - Deferred Management Action**

Option A - Support this option so that there is no further delay in management actions to help preserve the striped bass biomass!

## **4.2 Recreational Fishery Management Measures**

Option B/Sub Option B2 - Closure of spawning areas during spawning times will help striped bass populations recover.

Option C/Sub Option C1 & C2 - The release of striped bass is important when it comes to post-release mortality. Prohibit gaffs and make sure fish go back into the water with a minimum of harm.

Option D/Sub Option D1 - Outreach is important! Get the word out on why it's important to employ these conservation measures when releasing fish. There's a lot of ignorance on the water and I see fish being abused each season that will obviously die upon release.

## **4.4 Rebuilding Plan**

### **4.4.1 Recruitment Assumption**

Option B - This option offers more restrictive management efforts and promises to rebuild female SSB by 2029.

## **4.6 Alternative Mgmt Regimes**

Option B/ Sub Option B1 - Avoid Conservation Equivalency options for states. CE would be just another set of ways for states to avoid stricter regulations.

Thank you for accepting this public comment. I can be reached at the contact information below:

Joshua Wrigley  
50 Hayway Road  
East Falmouth, MA 02536  
518-810-9478

Joshua K. Wrigley  
[jkwrigley@gmail.com](mailto:jkwrigley@gmail.com)  
(518) 810-9478

**From:** [Pete Utschig](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 6:15:17 PM

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My name is Pete Utschig

I am from New York, Striped Bass are important to me because recreational fishing is my passion. My family and friends all love fishing and we spend a lot of time and money chasing striped bass.

A healthy Striped bass population is important to everyone, it is apparent that the bass are being overfished and on the decline. There needs to be improvements in the regulations or else they will be wiped out AGAIN.

I support

**4.1**

### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

### **Tier 3**

Option A- Support A2

Option B- Support B2

### **Tier 4**

Support A

Thank you

Pete Utschig

Sent from my iPhone

**From:** [Gary M](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 6:04:42 PM

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To whom it may concern:

As a recreational (spin/fly) fisherman, I would like to see management rebuild the striped bass population quickly while preventing them from becoming overfished again. I've been Striper fishing for almost 40 years and I want my son and grandchildren to be able to fish for them as well for another 40. As avid fishermen, 175+ hours a season, we've has tremendous family times on our Striper trips (we don't bottom fish). I believe there's more to be done to return these stocks to where they used to be, and maintained properly. I understand there's cycles in spawning, but this roller coaster of regulations, by each state, year after year is ridiculous. I'd support making the Striped Bass a recreational only species. We need a sportfish up in the Northeast, something like Tarpon in Florida.

Thank you

Gary Morrissette  
Londonderry, NH

**From:** [gkinnen](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Ammendment 7  
**Date:** Thursday, April 14, 2022 6:01:42 PM

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I'm writing today with only one thing in mind. The future and wellbeing of OUR striped bass. I have been fortunate enough to spend time working in the fishing industry in the media space for a time, and saw first hand how incredibly important stripers are to so many Americans. Even over the last 5 years of fishing for them on Cape Cod I have seen their numbers decrease in that short amount of time. I beg you take all these emails seriously to save our stripers. Thank you.

Garrett

**From:** [John Cooper](#)  
**To:** [Comments](#)  
**Cc:** [Megan Ware](#); [Stephen Train](#); [Sen. Dave Miramant](#); [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Public Comment re: Striped Bass Ammdement 7  
**Date:** Thursday, April 14, 2022 5:55:11 PM

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Let it be noted that I fully support ASGA's positions on all remaining options for Ammdement 7. I am a recreational fisherman in Maine (though I fish throughout New England), and I have observed tremendous drop off in the quality of striped bass fishing over the last 2 decades.

This stock represents not only a great source of happiness for countless anglers, but also a large economic opportunity up and down the Atlantic coast. I'm in favor of the most aggressive management actions to rebuild and sustain this resource for generations to come.

Thank you to ASGA for taking such a common sense and conservation minded position on Ammdement 7.

Sincerely,  
John Cooper  
Cumberland Maine



**From:** [Sam Adams](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 5:49:41 PM

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To the Atlantic States Marine Fisheries Commission,

I am a lifelong recreational fisherman who has focused nearly all of my efforts on catching wild striped bass. Over the last 30 years my efforts have been fly fishing from the surf and rocks around Small Point, Maine and by boat in and around Casco Bay. All of that has been catch-and-release fishing, with due regard for proper release of fish. Six years ago I became a Maine Guide with a Tidewater Specialty, and I am a member of the Maine Professional Guides Association, although I do not currently make my living from guiding. Through this experience I have been a close observer of the striped bass and the health of the stock over decades.

I believe that the striped bass is gravely over-fished and that steps to restore the stock must be taken immediately. I have experienced the decline of this fishery first hand, particularly over the last decade. I believe that the time has come for ASMFC to take a strong hand to establish a more uniform approach that limits state latitudes and to make the triggers for action both more sensitive and immediate. We cannot wait. Specifically, we need to end what I perceive as the abuse of Conservation Equivalency, which has allowed some states to skirt meaningful limits on total removal by twisting the dials without solid data. In short, I think that:

1. There should be no use of Conservation Equivalents when striped bass are overfished.
2. In general I oppose CE's, but whenever CE's are allowed, proposals must meet the federal standard of 30 percent Standard Error or less, so they are real and provide real overall limits.
3. In addition, (based on discussions with guides more knowledgeable than me) we need a 25% uncertainty buffer (front-end margin of error) built into any CE. This makes sense to me because of the difficulty in having adequate data on a coastwise basis and over years. Given the lifespan of bass and the years-to-breeding of females, the ratio of speed-to-overfishing versus time-to-restoration means errors that allow overfishing take a long time to correct through policy. It is this imbalance of how quickly the stock can be depleted by recreational and commercial fishing compared to how long it takes to restore it that has created this pendulum in the overall quantity and health of the striped bass stock. This ebb and flow is exacerbated by the natural increase and decrease in the population owing to species cyclicity. Only sound and uniform policy and reasonable margins for error with sufficient buffers can reduce this pendulum swing.
4. We need action now to preserve the stock of striped bass that we have and to help it to recover. This means we cannot afford to weaken any existing Management Triggers nor delay the implementation of any action as a result of a trigger being tripped. What is the point of having a trigger if management action can then be deferred? It should be a binary situation--if the trigger is tripped then management action should be basically foreordained and immediate. That is the situation we are in now as we see the overall biomass depleted in terms of numbers and size of fish.
5. Fly fishing requires a lot of time on the water and a lot of observation. I spend days waist deep in the surf observing fish and hopefully catching some. A decade ago I caught the largest striper of my life on a fly, nigh on 50 lbs (extrapolated by length). There were quite a number of fish in the 40" length in the surf in those days, and tons in the 30+" size. Now I see no no 40" fish in the surf and few in the 30" size. This is because until recently large bass, especially

breeding females, could be caught and kept in great numbers and with impunity up and down the region governed by ASMFC. This is not the Commission's fault per se, rather that the fractured state-by-state CE approach (in theory preserving the stock in aggregate, but in reality depleting it) allowed a situation where striped bass had to run a varied and brutal fishing gauntlet from Chesapeake and the Hudson to Maine, getting picked off along the way. With different lengths and limits state-to-state, what finally migrates to Maine today are now the lucky few who have survived the removals along the way. At the end of the season all of the remaining fish re-run this gauntlet back to the Hudson and the Chesapeake, greatly diminished in number. Now every state is seeing a dramatic decline in this treasured species because of overall policy and disastrous CEs that are alike to the tragedy-of-the-commons--every state fashioning rules to its advantage and relaying on doubtful data. It has to stop. We need to err in favor of striped bass preservation and restoration. If we are too conservative in our policy there is no harm in that; but being too liberal in our policy has been a disaster. We need the most conservative recruitment triggers and fastest timeline in the rebuilding plan, and we need to act quickly now.

6. To rebuild the striper stock we need the following: a robust set of data that is based on current (or the most recent available) information; 20 -year-old data won't do. A guide I rely on says we need the Low Recruitment Assumption, which I understand means the more conservative spawning success measures. Again, hewing toward a more conservative approach makes sense.

I have read and agree with the positions taken on Amendment 7 by the American Saltwater Guides Association, but I wanted to express my own views here.

The elements of Amendment 7 are too big and complicated for me. But I know what I experience, and that is that we are losing our efforts to preserve and restore the striped bass. The fish are smaller and more scarce now, and the season is shorter. No one needs to keep striped bass when they are so scarce, especially large fish. Please do all you can to structure this amendment to create a uniform standard across states to limit catch (don't let states use CE's to water down meaningful, uniform limits based on real science). Please take additional steps to limit mortality (catch-and-release in the water, end treble hooks, circle hooks for bait, etc.). And do what we can to protect forage fish, especially menhaden. Only by direct, broad-based, prompt, science-based, action can we restore this fish.

Thank you for your patience in reading this long comment.

Sam Adams  
45 Seal Cove Road  
Phippsburg, ME 04562

**From:** [Scott Henchey](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 5:48:31 PM

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Dear Atlantic Striped Bass Management Board,

I am a recreational striped bass fisherman on the north shore of Massachusetts. I have observed a decline in the striper population in my local water and other areas of New England for the past few years. Over those years the stress on the population has undoubtedly increased.

Fishing pressure and technology has drastically increased during the pandemic with more sonar equipped boats and interest in the sport. The commercial fishery is targeting the last strongholds the striper has left. The schools of bass are harvested until they are decimated and dispersed. Environmental factors such as development and the warming of the ocean only make this issue worse.

I strongly feel that the recreational fishing industry has much to offer the local businesses and governments who benefit from the interest in fishing for striped bass. If the striped bass population crashes as it did in the 70s and 80s, and as it is trending now with clear decking young of the year reports, the interest in fishing will disappear. Taking with it the money spent on enjoying the catch and release of this truly special fish.

It is my hope that the board will prioritize the regrowth of the striped bass population and conservation of the species when considering Amendment 7. I fully support any measures to support a healthy and robust population of striped bass.

Thank you for listening to public comments,

Scott Henchey

5 Hodges Court  
Apt 2  
Salem, MA 01970

**From:** [David Cangarl](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 5:48:27 PM

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Good afternoon,

I am writing this email as an avid angler from Rhode Island who would like to comment on the importance of rebuilding the striped bass stock and prevention of overfishing the existing population. I think we should always learn from the past. After hearing how the population was decimated not too long ago and seeing it start to decline again, I believe conservation efforts need to increase immediately in order to stop this in its tracks. I also believe that larger emphasis needs to be placed on the proper handling of catch and release stripers. I grew up around the water and loved to fish for schoolies and skipjacks in the bays with my father as a kid. Now that I'm having a child of my own, I look forward to doing the same with her but we need to make sure there are still enough of these fish around for when she is old enough to set that first hook and experience the excitement of striped fishing. I appreciate your consideration on this and taking the time to read this email.

Thanks,

Dave Cangarl

**From:** [dean machado](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Ammendment 7  
**Date:** Thursday, April 14, 2022 5:47:33 PM

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Dear Ms. Frankie and Atlantic striped bass management board.

I am a Recreational fisherman from Marblehead MA.

A healthy striped bass population is my greatest concern. Striped bass are ever man's fishin that you can catch it from a beach, a kayak or a boat with lures, or flies and they are in our waters from from April to November.

I was introduced to saltwater fishing by the striped bass. I am very concerned for the ASMFC's ability as currently configured to manage the striped bass population in a sustainable manner. I believe the current decline is largely because managers have yielded to political pressures by ignoring science and their own management triggers rather than looking out for the best interest of rebuilding fish stocks. The striped bass recovery from the last moratorium demonstrates if we take care of the fish the fish will take care of us. ASMFC needs to look in the mirror and learn from the past.

I support the following options:

4.1

Tier 1

Option A-support A1

Option B-Support B1

Option C-support C1

Tier 2

Option A-Support A2

Option B-Support B2

Option C-Support C1

Tier 3

Option A-Support A2

Option B-Support B2

Tier 4

Support A

4.2

Option B-Support no measure

Option C-Support C1,C2

Option D-Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Option B-Support B1-A

Option C-Support C3

Option D-Support D2

Option E-Support E2

I appreciate the opportunity to provide comments..

Sincerely,

Dean Machado

Sent from my iPhone

**From:** [Montefusco, Nick](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 5:45:09 PM

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I am an angler who spends a good deal of time and effort targeting striped bass, mostly from the surf-side beaches (as opposed to bays and estuaries) in NJ. I am concerned with the declines in striped bass populations up and down the east coast and would support stricter measures than are currently in place to rebuild the stocks. The following are my comments to Amendment 7:

1. I fully support the following Recreational Fishery Management Measures, as presented in the draft:
  - a. Option B2-a. No-Harvest Spawning Closure Required and Option B2-b. No-Targeting Spawning Closure Required. In both cases, I would strongly advocate for the Hudson River area to be defined to include Raritan Bay in NJ, as this adjacent area is used by spawning bass to stage before entering the Hudson River proper. I would add that since Raritan Bay has a no-targeting closure during Jan/Feb, extending this would be an easier to understand and enforce regulation than imposing a closure at some other point in the season, which isn't contiguous with the current closure period (i.e., it closes Jan 1 and stays closed until X is a lot easier than having sporadic closures). Also, this time period has little to no overlap with bluefish season, which makes enforcement easier and also allows legitimate angling for bluefish with no impediments.
  - b. The Additional Gear Restrictions in both sub-options C1 and C2.
  - c. Outreach and Education sub-Option D1.
2. Since I don't expect that Raritan Bay would be included in a Spawning Closure, I support sub-option B.1.a. - a minimum 2-week seasonal closure. This would allow NJ to implement a closure during Wave 2, which otherwise would not be allowed under sub-Option B.1.b., since for NJ, Wave 2 doesn't meet the minimum 25% threshold. I believe that future consideration should be given to defining the closure periods on the basis of high concentrations of spawning fish, which doesn't coincide necessarily with periods of highest targeted trips, yet is likely more impactful.
3. I support the most conservative approaches to Management Triggers and Stock Rebuilding.

Additional comments:

4. The focus on recreational effort is on the C&R fishery and associated mortality. While I recognize this is a significant component to the overall fishing mortality, the fact that harvest is permitted to the current extent (1 fish per day per angler within the size limits) and is not under consideration for further restrictions sends a message to the catch-and-keep anglers that the stock needs no further protection. It would seem to me that in order to send a consistent message to the public at-large that actions are needed to rebuild the stock, a different approach should have been considered with respect to recreational harvest. I believe lowering the maximum size of the current slot range would have been beneficial from both a biological and messaging standpoint.
  - a. From a messaging standpoint, it highlights to all recreational anglers that action is needed and is being taken.
  - b. From a biological standpoint, it allows for fish approaching, or at the lower end of, spawning size a better chance of survival to spawning.

Thank you for the opportunity to provide comments to the proposal.

Sincerely,

Nick Montefusco

Randolph, NJ

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**From:** [Frank Goncalves](#)  
**To:** [Comments](#)  
**Subject:** [External] RE: Atlantic Striped Bass Amendment 7 Public Comment Letter  
**Date:** Thursday, April 14, 2022 5:41:07 PM

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Dear Ms. Franke and Atlantic Striped Bass Management Board,

My name is Frank Goncalves and I've been a lifelong angler in Massachusetts. Although, I enjoy all species and all styles of fishing, the last 17 years, I've primarily land-based fished for striped bass. My love and obsession for striped bass never seems to dwindle. It just seems to intensify as they become harder and harder to locate.

I've been fortunate to live close to the water and have a schedule that allows me to get out often. However, it's become more and more difficult each year to find schools of any size striped bass. Often, you must travel in order find a few now, unfortunately.

I hope we can speed up the conversation efforts coast wide so all anglers can enjoy recreational fishing for striped bass before it becomes too late to act.

Thank you for your time. My options are as follows.

#### **4.1**

##### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

##### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

##### **Tier 3**

Option A- Support A2

Option B- Support B2

##### **Tier 4**

Support A



## **4.2**

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D2

### **4.4.1**

Support B

### **4.4.2**

Support B

### **4.6.2**

Option B- Support B1-a

Option C- Support C3

Option D- Support D2

Option E- Support E2

I appreciate the opportunity to provide comments. I do hope the Board seizes this opportunity to restore public trust and realize their mission of “leaving healthy and abundant marine fisheries for the next generation to enjoy”

-----

Frank Goncalves

Graphic Designer, Video Production

[www.mediumstudio.com](http://www.mediumstudio.com)

T > 508 493 4430

T > 508 992 8546

**From:** [Sue Daignault](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 5:40:56 PM

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Do not allow ANY striped bass to be kept if the fishery is in trouble. I know too many who kill bass even below limit sizes. Issue strong fines for those breaking the laws!

Sent from Sue's iPad

**From:** [Paul Skydell](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 5:38:05 PM

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Dear ASMFC,

I write in support for Amendment 7 and any and all science based conservation efforts. This fishery is in trouble, and you can do something about it.

Please do not be known as an instrument of expediency and ultimately failure.

Kind regards,

Paul Skydell

**From:** [Patrick Leibach](#)  
**To:** [Comments](#)  
**Cc:** [Michael Armstrong](#); [Dan Mckiernan](#); [Rep. Sarah K. Peake](#); [Raymond Kane](#); [RICK\\_JACOBSON@fws.gov](#)  
**Subject:** [External] Amendment 7 Comment  
**Date:** Thursday, April 14, 2022 5:37:41 PM

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To Whom it May Concern:

I write to comment on Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass. To preface, I've been fishing for stripers since I was four years old, and average 50-60 days on the water in each year (not counting freshwater or fishing I do outside Massachusetts). I've seen the fishery go from bust when I was a kid and the moratorium was implemented, to incredible and back to terrible the past few years (at least where I am; I'm cognizant that different areas have had different experiences, especially recently). I had my first child this past Winter, and the main purpose of me writing to comment is in the hope that the fishery will be available to her in some recognizable form by the time she's old enough to appreciate it (and selfishly, I'd also like to fish another few seasons that looked like the abundance I saw in 2003-2012). Specific comments on the options in the Amendment are below, but as an overall comment, I'd advocate for more near-term pain in favor of a long-term high-quality fishery. The Martha's Vineyard Striped Bass and Bluefish Derby - in which I participate, mostly fruitlessly, every year - did the right thing two years ago and removed stripers. That was the right idea.

My comments below are based on my lay understanding of the amendment; reading up about it, speaking with guide friends who are more involved in the day to day of the process, and doing my best to understand the nuances of the document itself. I'm not offering specific logic for every position below, rather pointing toward which I support, with the understanding that these options would have the best chance of achieving the long-term sustainable fishery I hope emerges from this process.

Thank you for your consideration.

#### 4.1 - Management Triggers

##### Tier 1 Options

Option A: I support sub-option A1 - action sooner than later

Option B: I support sub-option B1 - action sooner than later and avoiding the loophole in B2 that makes action less likely

Option C: I support sub-option C1 - action sooner than later

##### Tier 2 Options

Option A: I support sub-option A2 - I'd otherwise be concerned that no plan would be adopted

Option B: I support sub-option B1 - again, once at a critical point, requiring action is better than leaving it to discretion/negotiation

Option C: I support sub-option C1, though I'm concerned about the fact that F must also be low; I could see a scenario where female SSB falls but for whatever reason F is not measured as being high enough to trigger action

##### Tier 3 Options

Option A: I support sub-option A3 (though I admit I had to re-read the descriptions a few times)

Option B: I support sub-option B3

#### Tier 4 Options

I support Option A - if any management trigger is tripped, it means the stock condition is bad or deteriorating, and action should be mandatory

#### 4.2.2 - Measures to Address Recreational Release Mortality

Option B: I support sub-option B2 (though would like to see MD on there)

Option C: I support sub-option C1 - gaffs for stripers are ridiculous

Option D: I support sub-option D1

#### 4.4.1 - Recruitment Assumption for Rebuilding Calculation

I support Option B

#### 4.4.2 - Rebuilding Plan Framework

I support Option B

#### 4.6.2 - Management Program Equivalency

Option B - I support sub-option B1-a

Option C - I support sub-option C3

Option D - I support sub-option D2

Option E - I support sub-option E2

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Patrick P. Leibach  
Cell: 202-841-5658

**From:** [Jeff peikin](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment 7  
**Date:** Thursday, April 14, 2022 5:37:36 PM

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Good evening,

I am extremely avid striped bass angler and spend much of my time traveling to and from the eastern coastline, mostly in New Jersey, but hopefully further spots. I am certain that if striped bass levels went back to what they were when the stock was considered rebuilt that more money and recreational happiness would be seen in the communities where I fish.

I am worried about the state of the striped bass fishery and hope that you will accept my stance below on amendment 7

#### 4.1 Management Triggers

Tier 1: Fishing Mortality (F) Triggers

##### **Option A: Timeline to Reduce F to the Target**

**Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year.

##### **Option B: F Threshold Triggers**

**Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

##### **Option C: F Target Triggers**

**Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

Tier 2: Spawning Stock Biomass (SSB) Triggers

##### **Option A: Deadline to Implement a Rebuilding Plan**

**Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

##### **Option B: SSB Threshold Trigger**

**Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

##### **Option C: SSB Target Trigger**

**Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

Tier 3: Recruitment Triggers

#### **Option A: Recruitment Trigger Definition**

**Sub-option A2:** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

#### **Option B: Management Response to Recruitment Trigger**

**Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

Tier 4: Deferred Management Action

#### **Option A (status quo): No Deferred Management Action.**

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

#### **4.2.2 Measures to Address Recreational Release Mortality**

##### **Option C. Additional Gear Restrictions**

**Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

##### **Option D. Outreach and Education**

**Sub-option D2:** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

#### **4.4 Rebuilding Plan**

##### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

**Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

##### **4.4.2 Rebuilding Plan Framework**

**Option B:** 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 recruitment assumption specified in Amendment 7) 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.

#### **4.6.2 Management Program Equivalency (Conservation Equivalency)**

##### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

**Sub-option B1-a:** CE programs **4.6.2 Management Program Equivalency (Conservation Equivalency)**

##### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

**Sub-option B1-a:** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

##### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

**Sub-option C3:** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

##### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

**Sub-option D2:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

##### **Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

**Sub-option E2:** the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Sincerely,

Jeffrey A. Peikin  
3 N. Columbus Blvd  
Philadelphia, PA 19106

Sent from my iPhone

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Sent from Gmail Mobile



**From:** [Kevin Lesser](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 5:37:32 PM

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Hello,

My name is Kevin Lesser, and I'm an avid recreational fisherman. I live in Virginia and fish the Potomac river for Striper Bass and have been doing so for the last 15 years. I own an 18-foot center console and primarily target striped bass on light tackle. When I first started fishing the Potomac at the age of 20, it was not uncommon to catch 100 fish per trip. As a result, I seldom keep fish and always practice safe catch and release tactics.

I've seen the decline firsthand, and every year the fishing seems to get a little worse. So much so that if I'm fishing in the prime of the season, I'm lucky to catch 3 or 4 fish per trip. It's become so bad that I only fish the Potomac for striped bass about five times per year. When the fishing was good, and the stock was healthy, I'd fish about 75 times per year, targeting Striped Bass on the Potomac.

I now do most of my fishing in North Carolina, targeting other species (Spanish Mackerel, Cobia, Red Drum, and other bottom fish).

I'll dig into some of the items on Amendment 7, but my overall message is to have this fish managed for ABUNDANCE.

### **Tier 1: Fishing Mortality (F) Triggers and Tier 2: Spawning Stock Biomass (SSB) Triggers**

If the stock is below the SSB threshold and being overfished, the board should have to act immediately (1 year).

### **Tier 3: Recruitment Trigger**

I vote for A3. High Sensitivity (would have tripped six times since 2003): Any of the core JAIs is below the median of values from 1992-2006 for three consecutive years

*If the recruitment trigger is tripped, should there be a prescribed response? If so, how conservative should the Board's response be?*

I choose B2. Most Conservative Response: If F is greater than the interim F target (using low recruitment assumption), reduce F to the interim F target within one year.

### **Tier 4: Deferred Management Action**

I choose Option A. no deferred action; the problem should be addressed immediately.

## **RECREATIONAL RELEASE MORTALITY**

The 9% number is flawed and inaccurate. That number is being manipulated by groups who want to keep killing more fish, and they use this number to justify it.

Circle hooks should continue to be required when using dead or live bait.

### **Option B. Effort Controls (Seasonal Closures)**

I believe harvest should not be allowed during the spawning season, but catch and release fishing in those areas should be allowed when the water is cold, and fish are handled properly.

The fact that Maryland closed the month of April to recreational fishing is absolutely CRIMINAL.

And then allow the harvest of the most productive spawning fish to begin in May (Trophy Season) and even promote it.

### **General comments:**

I don't believe in commercial fishing for any striped bass, especially the breeding-size fish. Commercial fishing should not be allowed in January, February, March, April, and May. Yes, they can't keep fish over 35 or 36", but those 28 - 34" fish are still breeding females. The nets are placed strategically and way too successful.

If anything, let them fish in the summer and early fall when most Chesapeake Bay fish are males. There is absolutely no reason to allow nets or commercial fishing when the mature breeding females are in the Chesapeake Bay and its rivers.

Look what happened in North Carolina, they had a thriving winter fishery, and all the fishing guides were booked throughout the winter. However, after the Oregon Inlet disaster (<https://www.carolinasportsman.com/fishing/offshore-fishing/oregon-inlet-striper-massacre-occurs-during-trawler-hauls/>) the fishery has been wiped out. As a result, the charter captains are struggling. There is no commercial or recreational ocean striped bass fishery. Before COVID, the local economy would suffer from losing these beautiful fish during that time of year.

I also believe the Maryland trophy season should be OUTLAWED or implement a slot limit like Red Drum. Slot limits work, and there is no reason to be killing mature female fish. Red Drum and thriving, expanding its range, and anglers of all types enjoy the benefits the slot

limit has created.

**I do not believe in Conservation Equivalency, especially when the stock is overfished and the SSB is below the threshold. Maryland only uses CE to justify killing more mature fish and deny access to the C&R recreational angler.**

**The way Maryland DNR has treated this fish over the years, they should lose their board voting rights and have the regulations set for them by other states, the ASFMC or NOAA.**

**I fell in love with Striped Bass as a child, and my love for them continues to grow. If the way things continue, I'm afraid my future children and nephews will never have the opportunity I had, and I never saw the best of it. Maybe with your help, and dedication to the resource, I will one day see how amazing that fishery was.**

**I also want to point out that the Maryland DNR director was unprofessional in that session. The public was commenting out of passion and taking valuable time out of their day to participate in the process. The Maryland DNR director, stating that the comments should be shut off and that it was getting late, was entirely out of line. We don't get paid to do this, and we all know where his head is at.**

**If the trophy season is allowed to continue, the charter boats should also be limited to 1 or 2 fish per boat. VA & NC both do this with Cobia, another fishery in trouble. These boats can take up to 15 people and are allowed 1 trophy fish per person. This should also apply to recreational boats fishing during the trophy season, and those limits should be even more restrictive.**

**I won't go on social media during the trophy season because seeing the slaughter of mature females truly breaks my heart.**

**Overall, I want the stock to be managed for Abundance!**

**Emilie - I think you did a great job, and thank you for everything you do.**

All the best,

Kevin Lesser

**From:** [Duncan Barnes](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 5:34:38 PM

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For Emilie Franke

As a striped bass angler for more than 70 years, I am extremely frustrated with the management of the fishery. The ASMFC admits the resource is being overfished and those of us who are on the water every striper season continue to experience a deteriorating fishery. Yet the ASMFC seems unable to put corrective measures in place in a timely fashion.

Managing a major migratory species like the striped bass is no easy task. Even the crustiest of us longtime fishermen would admit that. But many of us believe that the deck is stacked by fishery decision makers catering to their constituents and not managing striped bass as a migratory species of huge economic and recreational importance up and down the Atlantic coast.

Looking at Draft Amendment 7, I am somewhat encouraged by the ASMFC's review of conservation equivalency (which should not be permitted for any state while overfishing is occurring), and of the need for quicker triggers to deal with mortality issues, spawning stock biomass, and recruitment.

And anything that fishery managers and the angling fraternity can do to promote common sense gear restrictions and the safe handling of stripers to be released is equally important for striper conservation.

It's past time for the ASMFC to get on track with striped bass management decisions that can be put into place as soon as needed – not deferred or otherwise postponed while overfishing continues and the resource is at risk.

Thanks for listening.

Duncan Barnes

[bardunc@gmail.com](mailto:bardunc@gmail.com)

**From:** [Ted Lang](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 Comments  
**Date:** Thursday, April 14, 2022 5:33:14 PM

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## To Whom It May Concern:

My name is Ted Lang, I am an avid recreational saltwater fisherman in Kittery Maine. I am writing to provide my comments on the draft amendment 7 in an effort to drive sustainability and abundance in the striped bass fishery. Thank you for allowing me the opportunity to make my voice heard.

Over the last several years I have experienced a concerning decline in the quantity and size of striped bass in my region. Like many recreational anglers, I contribute thousands of dollars annually to the economy to continue doing what I love. It is my opinion that striped bass are far more valuable as a game fish than they are for consumption, and that by managing for abundance, the ASMFC can ensure continued economic growth in the recreational fishing industry.

One point of emphasis I'd like to make is that I am fundamentally opposed to conservation equivalency. This is a shared resource, and no state should have the ability to make independent decisions that will impact the stock as a whole.

Below are my comments as they relate to the draft amendment 7:

### **4.1 Management Triggers**

#### **Tier 1: Fishing Mortality (F) Triggers**

Option A: Timeline to Reduce F to the Target

I am in favor of sub-option A1 (status quo): Reduce F to a level that is at or below the target within one year.

#### **Option B: F Threshold Triggers**

I am in favor of Sub-option B1 (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

#### **Option C: F Target Triggers**

I am in favor of Sub-option C1 (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

#### **Tier 2: Spawning Stock Biomass (SSB) Triggers**

### **Option A: Deadline to Implement a Rebuilding Plan**

I am in favor of Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

### **Option B: SSB Threshold Trigger**

I am in favor of Sub-option B1 (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

### **Option C: SSB Target Trigger**

I am in favor of Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

## **Tier 3: Recruitment Triggers**

### **Option A: Recruitment Trigger Definition**

I am in favor of Sub-option A2: The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

### **Option B: Management Response to Recruitment Trigger**

I am in favor of Sub-option B2. If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

## **Tier 4: Deferred Management Action**

I am in favor of Option A (status quo): No Deferred Management Action.

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

## **4.2.2 Measures to Address Recreational Release Mortality**

### **Option C. Additional Gear Restrictions**

I am in favor of Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

I am in favor of Sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

### **Option D. Outreach and Education**

I am in favor of Sub-option D2: It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

## **4.4 Rebuilding Plan**

### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

I am in favor of Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

### **4.4.2 Rebuilding Plan Framework**

I am in favor of Option B: 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 recruitment assumption specified in Amendment 7) 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.

## **4.6.2 Management Program Equivalency (Conservation Equivalency)**

### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

I am in favor of Sub-option B1-a: CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**



I am in favor of Sub-option C3: CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

**Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

I am in favor of Sub-option D2: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

**Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

I am in favor of Sub-option E2: the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Thank you again for allowing me to share my thoughts on the subject.

Best Wishes,

Ted Lang

**From:** [Doug Schantz](#)  
**To:** [Comments](#)  
**Cc:** [Emerson Hasbrouck](#); [James Gilmore](#); [Sen. TODD KAMINSKY](#); [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 5:22:39 PM

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Dear members of the ASMFC Atlantic Striped Bass Management Board,

Thank you for the opportunity to comment on the Amendment 7 Draft Document.

I am a recreational angler on the east end of Long Island and as such I believe it is imperative to ensure the long term abundance of Striped Bass in our waters. I think it's safe to say that everyone benefits from the abundance of these fish and it needs to be a priority to see their population thrive.

Below are my thoughts on the four options in the draft amendment.

#### **4.1 Management Triggers**

##### Tier 1: Fishing Mortality (F) Triggers

###### Option A: Timeline to Reduce F to the Target

I support sub-option A1 (status quo): Reduce F to a level that is at or below the target within one year.

###### Option B: F Threshold Triggers

I support Sub-option B1 (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

###### Option C: F Target Triggers

I support Sub-option C1 (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

##### Tier 2: Spawning Stock Biomass (SSB) Triggers

###### Option A: Deadline to Implement a Rebuilding Plan

I support Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

###### Option B: SSB Threshold Trigger

I support Sub-option B1 (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

###### Option C: SSB Target Trigger

I support Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass

management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

### Tier 3: Recruitment Triggers

#### Option A: Recruitment Trigger Definition

I support Sub-option A2: The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

#### Option B: Management Response to Recruitment Trigger

I support Sub-option B2. If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

### Tier 4: Deferred Management Action

I support Option A (status quo): No Deferred Management Action.

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

## **4.2.2 Measures to Address Recreational Release Mortality**

#### Option C. Additional Gear Restrictions

I support Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

I support Sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

#### Option D. Outreach and Education

I support Sub-option D2: It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

## **4.4 Rebuilding Plan**

### 4.4.1 Recruitment Assumption for Rebuilding Calculation

I support Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

### 4.4.2 Rebuilding Plan Framework

I support Option B: 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 recruitment assumption specified in Amendment 7) 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.

#### 4.6.2 Management Program Equivalency (Conservation Equivalency)

##### Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status

I support Sub-option B1-a: CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

##### Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals

I support sub-option C3: CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

##### Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries

I support Sub-option D2: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

##### Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries

I support Sub-option E2: the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Thank you for your consideration.

Sincerely,  
Douglas Schantz

**From:** [Mark Mobius](#)  
**To:** [Comments](#)  
**Subject:** [External] Commenting on the proposed striped bass Amendment 7  
**Date:** Thursday, April 14, 2022 5:20:24 PM

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To members of the commission,

My name is Mark Mobius. I have been an angler on the east end of Long Island for nearly 50 years, hold a Masters of Environmental Management degree, and have worked in conservation and natural resources management, both internationally and domestically, for almost 30 years. I write today to comment on the proposed striped bass Amendment 7, as I do not want to see striped bass populations continue to decline or plummet to the levels seen in my youth in the 1980s.

I believe the commission should take all steps necessary to protect the striped bass fishery, prevent overfishing and manage the striped bass stock for abundance as quickly as possible.

Of highest concern is the practice of Conservation Equivalency, which I believe SHOULD NOT be used, especially when a stock is overfished.

I support the following options:

#### **4.1 Management Triggers**

Tier 1:

Option A - Support **A1**

Option B - Support **B1**

Option C - Support **C1**

Tier 2:

Option A - Support **A2**

Option B - Support **B1**

Option C - Support **C1**

Tier 3:

Option A - Support **A3**

Option B - Support **B2**

Tier 4:

Support **A**

#### **4.2 Measures to Address Recreational Release Mortality**

Option B - Support **B2**

Option C - Support **C1, C2**

Option D - Support **D2**

#### **4.4.1 Recruitment Assumption for Rebuilding Calculation**



From: [Conor Sheridan](#)  
 To: [Comments](#)  
 Cc: [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
 Subject: [External] Draft Amendment 7  
 Date: Thursday, April 14, 2022 5:20:24 PM  
 Attachments: [image001.png](#)

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Dear ASMFC,

My name is Conor Sheridan and I am a Massachusetts native, a Seafood lover, an avid fisherman, and a parent to a new generation of outdoorsmen/women.

Going forward I would like to see the Striped Bass Fishery managed to a level of **abundance**. I believe ASMFC should:

- **Significantly** reduce mortality and build back an **abundant** and more-than-sustainable Striped Bass population
- Over- conserve rather than under- conserve
- Get rid of conservation equivalency

I think this will be achieved in part by taking the below approach on amendment 7:

### My Selection

4.1	Tier 1	A	<b>A1</b>
		B	<b>B1</b>
		C	<b>C1</b>
	Tier 2	A	<b>A2</b>
		B	<b>B1</b>
		C	<b>C1</b>
	Tier 3	A	<b>A3</b>
		B	<b>B2</b>
	Tier 4		<b>A</b>
		B	<b>B2-B</b>

4.2	C	<b>C1, C2</b>
	D	<b>D1</b>
4.4.1		<b>B</b>
4.4.2		<b>B</b>
4.6.2	B	<b>B1-A</b>
	C	<b>C3</b>
	D	<b>D3</b>
	E	<b>E2</b>

**Why am I making these recommendations:**

- This fish is an incredibly important economic resource as a game fish.
- It is very migratory and should be subject to coast-wide restrictions by removing conservation equivalency.
- I think aggressive steps now will provide the runway for decades of sustainable striped bass fishing in the future.
- We owe it to america's greatest game fish.

Thank you,

Conor Sheridan



**From:** [Alex B](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7 Public Commentary  
**Date:** Thursday, April 14, 2022 5:08:02 PM

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To the Advisors and Board members of the Atlantic States Marine Fisheries Commission:

My name is Alex Bagdonas. I am an avid angler living in Massachusetts. I have been fishing for these amazing fish since I was a young child, both on fly and spin, and consider it a way of life. Striped Bass fishing is a passion of mine that I expect to hand down to my kids and others in the future. For that reason, I feel that they need to be managed for abundance. Protecting striped bass stocks, safeguarding the recreational angling industry that relies on these fish, and ensuring that future generations of anglers can enjoy catching our coastal fishery are paramount. With this said, I wish to support the following options in the current Amendment 7 draft:

On 4.1 Management Triggers, I support:

- Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality
- Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold
- Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions
- Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, I support:

- Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method
- Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, I support:

- Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. We recognize this option may require more restrictive management measures than option A, which I support

On 4.4.2 Rebuilding Plan Framework, I support:

- Option B to allow the Board to take direct management actions as well as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, "Management

program equivalency (also known as “conservation equivalency” or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

I believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically, I support:

- Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level
- Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates
- Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries
- Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

Thank you for providing the opportunity to comment on Amendment 7. I look forward to learning the outcome of the upcoming stock assessment and to reading the final version of the Amendment.

Alex Bagdonas

4/14/2022

Newton, MA

**From:** [Adam Piotrowski](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 5:04:23 PM

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My name is Adam Piotrowski I am a avid surfcaster on Long Island.

I would like to see a moratorium on the keeping if any Striped Bass for a season or two. I know I'm not speaking for only myself. Most hardcore surfcasters care for this not as a livelihood to make a living but more for mental sanity. The Striped bass is the backbone and what makes surfcasting a past time of the northeastern states as a whole.

**From:** [Eric Spicer](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 4:58:10 PM

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My name is Eric Spicer and I am an avid boat fisherman from the state of Rhode Island. Striped bass are the peoples' fish. We need to work to preserve that tradition for future generations. We will never know if we over managed, but we will know if we didn't do enough. I would rather err on the side of over management. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Eric Spicer  
North Kingstown, Rhode Island  
Email: [espicer13@gmail.com](mailto:espicer13@gmail.com)

**From:** [Tyler Niven](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 4:50:54 PM

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To whom it may concern.

My name is Tyler Niven, I was born and raised in Brunswick Maine and was lucky enough to spend my summers on Casco Bay. After leaving for college I have now returned back to Brunswick to work in my family oyster farm in Maquoit Bay in Brunswick.

I have spent countless hours in the spring summer and fall throwing flies in the hunt for striped bass. I believe that the population of striped bass does need to be protected and rebuilt as quickly as possible. I have far too many memories fishing for these beautiful fish and do not want to see these fish disappear. We must protect them and rebuild them.

Best,  
Tyler Niven

Sent from my iPhone

**From:** [John Rose](#)  
**To:** [Comments](#); [KURT BLANCHARD](#); [Jason E. Mcnamee](#); [DAVID BORDEN](#); [Sen. Susan Sosnowski](#); [Eric Reid](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 4:47:17 PM

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Board Members,

Let me first say that I grew up fishing RI waters and have recently moved back here and been able to once again fish my home shores and waterways.

I am 34 years old, and in this time I have even noticed a decline in stripers visiting our shores. This is a travesty that in a mere few decades the fishing is noticeably different. We (fisherman, lawmakers, environmental activists, etc) know we are overfishing this resource and yet we continue to delay addressing these important issues. This needs to stop! I'd like to endorse and ask that you join me in endorsing, Amendment 7 regarding the striped bass population and regulation of the fishery.

The American Saltwater Guide Association has come up with what I believe is an effective and necessarily aggressive management plan for the fishery. This plan is detailed here: <https://saltwaterguidesassociation.com/striped-bass-amendment-7-public-comment-guide/>

Please help save this fishery that has given this great state so much.

Respectfully,  
John Rose

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John Rose  
Phone:(401)578-2015  
[Email:rosej12@gmail.com](mailto:rosej12@gmail.com)

**From:** [Jack Hurley`](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 4:43:27 PM

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My name is John Hurley and I'm a lifelong fisherman in Maine. I wouldn't like to see any CE's or exceptions given while Striped Bass are being overfished, which they are right now, and have been for many years. It makes no sense to be lenient with the laws surrounding a species whose population collapsed just decades ago and is likely on the verge of collapsing again.

Thanks,  
John



**From:** [Theo Caplan](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 4:39:13 PM

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You guys really need to consider not only the fish that make up the entire striper coast, but even more the lively hood they provide for all types of fisherman and or tourists!!

PLEASE AT LEAST PROMOTE CATCH AND RELEASE+REDUCE LIMITS AND MAKE STRIPED BASS A SPORT FISH!!

Thanks you

From: [Pete Weeks](#)  
To: [Comments](#)  
Subject: [External] Amendment 7  
Date: Thursday, April 14, 2022 4:38:33 PM

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**We need action, not delays to protect and increase the healthy breeding population of striped bass.** The steps taken should be science based for the maximum effect in the shortest time frame possible. As an angler I already take many steps to avoid fishing in spawning areas, use only inline circle hooks when bait fishing, and release fish as quickly and cleanly as possible. I am willing to take any further steps including limiting my recreational fishing opportunities for the long term health and well-being of this species.

Respectfully,

Peter Weeks  
10 Hellbrook Lane Ulster Park NY 12487

My suggestions are as follows:

#### **4.1 Management Triggers**

##### **TIER 1 OPTIONS: Fishing Mortality (F) Triggers**

\* Option A: Timeline to Reduce F to the Target\* I supports Sub-option A1 (status quo): Reduce F to a level that is at or below the target within **one year**.

\*Option B: F Threshold Triggers\* I support Sub-option B1 (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

\*Option C: F Target Triggers\* I support Sub-option C1 (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

##### **TIER 2 OPTIONS: Female Spawning Stock Biomass (SSB) Management Triggers**

\*Option A: Deadline to Implement a Rebuilding Plan\* I support Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment.

\*Option B: SSB Threshold Trigger\* I support Sub-option B1 (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be

adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

\*Option C: SSB Target Trigger\* I support Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

### **TIER 3 OPTIONS: Recruitment Triggers**

\*Option A: Recruitment Trigger Definition\* I support Sub-option A3: The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model (NY, NJ, MD, VA) shows an index value that is below the median of all values in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years. The high recruitment reference period used for this trigger may be adjusted as recommended by the TC during benchmark stock assessments. This trigger alternative has a higher sensitivity than both the status quo trigger and sub-option A2 (Figure 1). This trigger alternative would have tripped six times since 2003: NY in 2006; MD in 2008; MD in 2009; MD and VA in 2010; NY in 2013; MD in 2014 (Table 2).

\*Option B: Management Response to Recruitment Trigger\* I support Sub-option B2. If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

### **TIER 4 OPTIONS: Deferred Management Action**

-I support Option A (status quo): No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

## **4.2 Recreational Fishery Management Measures**

### **Option B. Effort Controls (Seasonal Closures)**

-I support Sub-option B2. Spawning Area Closures: The Board can select either or both of the following sub-options B2-a and B2-b. Multiple states currently have spawning closures in place with closure boundaries defined by those states. Existing spawning closures would be applied toward meeting the requirements of the selected option(s).<sup>15</sup> Spawning area closures during the spawning season could contribute to stock rebuilding by eliminating harvest and/or reducing releases of spawning and pre-spawn fish. Reducing releases during this time is particularly important to reduce stress and injury to fish as they move into lower salinity spawning areas. If new information on the timing of striped bass spawning is available in the future, the TC would conduct a review of that research and recommend changes to the timing of spawning closures if needed. If this option is selected, CE would not be permitted.

-I support Sub-option B2-b. No-Targeting Spawning Closure Required: All recreational targeting of striped bass would be prohibited for a minimum two-week period on all spawning grounds (not necessarily the entire spawning area) during Wave 2 (March-April) or Wave 3 (May-June), as determined by states to align with

peak spawning. States will determine the boundaries of spawning ground closures. Closures prohibiting recreational targeting on spawning grounds have already been implemented in Maine (Kennebec River), New Jersey (Delaware River), and Maryland (Chesapeake Bay) during part of Wave 2 and/or Wave 3 (Figure 4).

### **Option C. Additional Gear Restrictions**

-I support Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

-I support Sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

Seriously, these options are a no brainer. No gaffs for removing fish from the water. C2 would require non circle hooked fish (J-hook when fishing for other species) to be returned to the water as soon as possible and with careful handling. Both of these measures combat recreational release mortality which has been determined to have a large effect on F.

### **Option D. Outreach and Education**

-I support Sub-option D1: States would **be required** to promote best striped bass handling and release practices by developing public education and outreach campaigns. States **must provide** updates on public education and outreach efforts in annual state compliance reports. We paid for it already with our license fee...

## **4.4 REBUILDING PLAN**

### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

-I support Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

### **4.4.2 Rebuilding Plan Framework**

-I support Option B: 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 recruitment assumption specified in Amendment 7) 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.

## **4.6 ALTERNATIVE STATE MANAGEMENT REGIMES**

### **4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option B. Restrict the Use of Conservation Equivalency Based on Stock Status**

-I support Sub-option B1. Restrictions: CE programs would not be approved when Sub-option B1-a: the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

### **4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option C. Precision Standards for MRIP Estimates Used in Conservation**

## **Equivalency Proposals**

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-I support Sub-option C3: CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30.

### **4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

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-I support Sub-option D3: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 50%.

### **4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

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-I support Sub-option E2: Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state-specific level.

**From:** [Ross MacKeil](#)  
**To:** [Comments](#)  
**Subject:** [External] Ammendment 7  
**Date:** Thursday, April 14, 2022 4:38:04 PM

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Advisors and Board members of the Atlantic States Marine Fisheries Commission:

I have been fishing for striped bass since I was old enough to hold a fishing rod. Pursuing this species with my late father was what we enjoyed most together. Seeing the decline of the species is heartbreaking. I have always this fish and the rules surrounding its preservation for generations to come. Please consider my view on the following management strategies:

On 4.1 Management Triggers, I support:

Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality

Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold

Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions

Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, I support:

Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method

Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, I support:

Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. We recognize this option may require more restrictive management measures than option A, which we support

On 4.4.2 Rebuilding Plan Framework, I support:

Option B to allow the Board to take direct management actions as well as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, “Management program equivalency (also known as “conservation equivalency” or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

Therefore, I support:

Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level

Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates

Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries

Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

I hope my views are considered in drafting the Final Amendment, thanks for your time.

Ross

**From:** [William Sanchez](#)  
**To:** [Comments](#)  
**Subject:** [External]  
**Date:** Thursday, April 14, 2022 4:31:43 PM

---

William Sanchez  
221 West Euclid Ave

Haddonfield, NJ, 08033

14 April 2022

Emilie Franke [comments@asmfc.org](mailto:comments@asmfc.org)  
FMP Coordinator  
Atlantic States Marine Fisheries Commission  
1050 N. Highland Street, Suite 200 A-N  
Arlington, VA 22201

Dear Ms. Franke,

Thank you for considering my public comments about the Draft Amendment 7 to the Interstate Management Plan for the Atlantic Striped Bass.

I am 24 years old and have fished for Striped Bass from the surf since I was 8. I am not an avid surfcaster and I only fish for Striped Bass a few times each year. Successfully fishing for Striped Bass requires long hours of strenuous activity, mostly at night, often in cold and wet conditions. I mainly enjoy surfcasting for Striped Bass because it's my father's passion and I enjoy spending time with him.

Striped Bass have been in decline for most of the time I have been fishing. It is important that we protect and return the population of Striped Bass to good health as quickly as possible. When I have children of my own, I'd like for them to discover Striper fishing and experience it with me and my father. Perhaps they will have the passion that I lack. If they do, I want to ensure that there are Striped Bass for them to catch.

I support the following Draft Amendment 7 options below:

**4.1 Management Triggers:**

Tier 1-Fishing Mortality Management Triggers

- Option A1
- Option B1
- Option C1

Tier 2-Female SSB Management Triggers

- Option A2



- Option B1

- Option C1

Tier 3-Recruitment Triggers

- Option A2

- Option B2

Tier 4 Deferred Management Action

- Option A

#### **4.2.2 Recreational Release Mortality**

- Option B-2a

- Option C1

- Option C2

- Option D2

#### **4.4.1 Rebuilding Plan**

- Option B: Use low recruitment regime assumption

#### **4.4.2 Rebuilding Plan Framework**

- Option B

#### **4.6.2 Management Program Equivalency**

- Sub-Option B1a

- Sub-Option B2b

- Sub-Option B1c

- Sub-Option C3

- Sub-Option D3

- Sub-Option E2

Thank you again for your time and consideration.

-William A. Sanchez

Electronics Technician 3rd Class

U.S. Coast Guard, Cutter Munro (755)

**From:** [lanerodney@comcast.net](mailto:lanerodney@comcast.net)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 4:29:44 PM

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ASMFC,

I am 66 years old and have fished for stripers in Casco Bay, Maine for the past 20+ years. I fish close to 100 days a summer.

Over the years I've watched a steady decline in the quality of the fishery. Anglers new to striper fishing think the fishery is in pretty good shape.

I know from experience that the abundance of earlier times is long gone. Today we are happy if we catch a fish or two per tide.

I believe the fishery has been poorly managed for many years. The ASMFC does not listen to the people who know the fishery the best, the recreational angler.

I support a 10-year equitable [recreational & commercial] harvest moratorium.

I know you won't accept that, so I support the following options:

#### **4.1 Management Triggers**

##### Tier Options F Triggers

- Timeline – Sub-option A1
- Threshold Triggers – Sub-option B1
- F Target Triggers – Sub-option C1

##### Tier 2 Option SSB Triggers

- Sub-option A2
- Sub Option B1
- Sub-option C1

##### Tier 3 Recruitment Triggers

- Option A3
- Option B2

##### Tier 4 Deferred Management Action

- Option A

#### **4.2 Reactional Fishery Management Measures**

##### Option B Seasonal Closures

- Sub-option B2
- Sub-option B2-b

##### Option C Additional Gear Restrictions

- Sub Option C1
- Sub-option C2

##### Option D Outreach & Education

- Sub-option D1

#### **4.4 Rebuilding Plan**

##### 4.4.1 Recruitment Assumption for Rebuilding Calculation

Option B

##### 4.4.2 Rebuilding Plan Framework

Option B

#### **4.6 Alternative State Management Regimes**

##### 4.6.2 Management Program Equivalency [CE] Option B

Sub-option B1

##### 4.6.2 Management Program Equivalency [CE] Option C

Sub-option C3

##### 4.6.2 Management Program Equivalency [CE] Option D

Sub-option D3

##### 4.6.2 Management Program Equivalency [CE] Option E

Sub-option E2

Please do your job and protect the fish.

The fish are much more valuable when left in the water.

Thank you for taking my comments.

Respectfully,  
Rodney P. Lane  
Freeport, Maine  
Sugar Land, Texas

**From:** [Mark Seymour](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 4:29:32 PM

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Please add my voice to the growing number of people who believe the Striped Bass Population to be in danger. The fact that commercial fishermen couldn't fill their quota the last two years should be evidence enough that there's a problem. Please do something!

Mark@fishhookvineyards.com

**From:** [Doug Dearie](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 4:25:43 PM

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To the ASMFC Board:

I would like to weigh in on Amendment 7 as I consider it a key to the future of this fishery. I am a lifelong fisherman (now 75) and I spend many days on the water each year. I spend hundreds of dollars a year on fishing for striped bass both on private vessels and with professional guides.

Additionally, I have been instrumental in introducing many people to this fishery over the years, including my nieces and nephews, in-laws, and many friends and colleagues.

I want you to know that I support management triggers that conservatively care for the stock and will promote its abundance. Here are my positions:

#### **Section 4.1 - Management Triggers**

On fishing mortality (F):

- I think options A1, B1, and C1 will all provide clear aggressive timelines to reduce fish mortality while tracking data over time.

On spawning stock biomass (SSB) triggers:

- I think Sub-Option A2 must be adopted to implement a 2 year deadline for the rebuilding plan.
- I think Sub-Option B1 should be adopted to rebuild the SSB in no less than 10 years.
- I think Sub-Option C1 should be adopted such that if SSB and F targets are exceeded in two years, the management program MUST be adjusted.
- 

On Recruitment Triggers:

- I think Sub-Option A2 should be implemented such that the recruitment trigger is tripped when the JAI indices show recruitment below 75% of the '92-'06 JAI.
- I think Sub-Option B2 should be implemented such that if the recruitment trigger is tripped, a new F target is calculated within 1 year.

On the Deferred Management Plan:

- I think Option A is the only smart choice given the critical state of our stock – we should not permit deferred management action and should require the board to immediately respond based on assessment updates.

#### **Section 4.22 - Measures to Address Recreational Release Mortality**

On Additional Gear Restrictions:

- I think Sub-Option C1 should be implemented such that fisherman are prohibited from using lethal devices to pull striped bass from the water.
- I also think Sub-Option C2 should be implemented such that any striped bass taken by

unapproved method must be returned to the water immediately.

On Outreach and Education:

- I believe Sub-Option D2 should be embraced such that all states are promoting best handling and release tactics to reduce mortality.

#### **Section 4.6.2 - Management Program Equivalency**

On Restricting the use of conservation equivalency (CE) based on stock status:

- It is a no-brainer to embrace Sub-Option B1 - the Conservation Equivalency should be restricted and not approved if a stock is overfished.

On Precision standards for MRIP Estimates for CE Proposals:

- I think Option C3 should be impeded such that CE proposals should not be able to use any Marine Recreational Information Program estimates with associated percent standard errors of greater than 30%.

On CE Uncertainty Buffer for Non-Quota Managed Fisheries:

- I embrace Sub-Option D2 such that an uncertainty buffer of 25% be required for all CE programs for non-quota-managed fisheries.

On Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries:

- I believe Sub-Option E2 should be implemented so that proposed CE programs have to demonstrate their equivalency to the FMP standard percent reduction at the state-specific level.

Thanks for taking the time to review my positions. It is important that the ASMFC manage our keystone fishery for abundance as much as possible as we move forward. Given the state of the fishery, and the recent year over year data, our fishery's future will be very bleak unless we take the necessary steps to reduce mortality and allow our remaining larger fish to spawn and thrive.

Regards,  
Douglas Dearie

**From:** [Kevin Blinkoff](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 4:22:46 PM

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

SUBJECT: Draft Amendment 7

I am a Massachusetts resident and the editor in chief of On The Water Media, which produces On The Water Magazine, On The Water TV, the Striper Cup tournament, and the StriperFest celebration.

On The Water was launched on Cape Cod in 1996 and has grown for the past 26 years to cover all waters where Atlantic striped bass swim. Like so many other fishing- and tourism-related businesses in our region, our existence depends upon the abundance of striped bass. There is perhaps no better example than our Striper Cup, which is a catch-and-release tournament that has attracted national sponsors and grown to nearly 6,000 participants.

I am writing as a private angler who has fished recreationally for striped bass since moving to Massachusetts in 2000, and my comments are not being made on behalf of my employer. As a striped bass angler, I support balancing precautionary management with regulatory stability and reasonable access. To achieve that, I support the following options.

#### **Section 4.1 Management Triggers**

##### Tier 1: Fishing Mortality Triggers

Timeline to Reduce F to the Target: **I support Sub-option A1** (status quo)

F Threshold Trigger: **I support Sub-option B1** (status quo)

F Target Trigger: **I support Sub-option C1** (status quo)

-

##### Tier 2: Female Spawning Stock Biomass Triggers

Deadline to Implement a Rebuilding Plan: **I support Sub-Option A2**

SSB Threshold Trigger: **I support Sub-option B1** (status quo)

SSB Target Triggers: **I support Sub-option C1** (status quo)

-

##### Tier 3: Recruitment Triggers

Recruitment Trigger Definition: **I support Sub-option A2** (Moderate Sensitivity)

Management Response to Recruitment Trigger: **I support Sub-option B2**

-



Tier 4: Deferred Management Action

Deferred Management Action, **I support Option A** (No deferred management action)

**Section 4.2.2: Measures to Address Recreational Release Mortality**

Seasonal closures: **I support Sub-options B2 Spawning Area Closures.** But, I urge the board to be mindful of the economic benefits of spring fisheries and the difficulty in enforcing no-targeting closures. If no-targeting closures are used, they need to be measurable, justified, and apply to both sectors.

Gear restrictions: **I support Sub-options C1 and C2**

Outreach and Education: **I support Sub-option D1**

**Section 4.4 Rebuilding Plan**

Recruitment Assumption for Rebuilding Calculation: **I support Option B**

Rebuilding Plan Framework: **I support Option B**

Management Program Equivalency: **I support Sub-options B1-A and B1-C, C3, and D1.**

Definition of Equivalency: I am supportive of constraints on CE and recommend referring this to the subgroup of ASMFC's management and science committee working on revisions to the broader CE policy to further consider its implications and provide further analysis of the performance of CE programs relative to coastwide measures to help better inform this discussion.

Thank you for the opportunity to share my thoughts on this important issue.

Kevin Blinkoff  
Cataumet, MA

**From:** [Zack Bassage](#)  
**To:** [Comments](#)  
**Cc:** [b.kostraba@gmail.com](mailto:b.kostraba@gmail.com)  
**Subject:** [External] Amendment 7 -- Request  
**Date:** Thursday, April 14, 2022 4:21:53 PM

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Dear Committee Members,

I am writing to ask you to take a look to make a final decision on Amendment 7. Striped Bass are one of our nation's greatest resources due to their accessibility to everyone. They are the only fish we have on the east coast that can be caught in the deep waters off the coast, in the flats, tributaries, and deltas of the coast, as well as in the freshwater pools of our major rivers. This is a fish that our kids, grandkids, and great grandkids should have the opportunity to chase and catch. Its a fish that is not only at the center of many personal memories but also an economic center for so many people.

For that reason, I am asking that you support the following actions to protect this resource:

1. Tier 1, Option A2: Reduce Fishing Mortality to a level that is at or below the target within a year.
  - o Option C1: If the committee cannot agree to this, I would ask that they support using the Fishing Mortality and SBB metrics as laid out in Option C.
2. Tier 2, Option A2: Install a two year deadline on implementing a Rebuilding Plan
3. Tier 3, Option B2
4. Tier 4, Option A: Enact a management plan with no deferred action
5. Sub-option C1 under 4.2.2 Measures to Address Recreational Release Mortality: prohibit the use of lethal devices to remove striped bass from the water
6. Sub-option D2 under 4.2.2 Measures to Address Recreational Release Mortality: Continue promoting best practices for handling and release of fish. States should provide updates on education and outreach efforts for monitoring purposes
7. Option B for the Rebuilding Plan Framework
8. Option B for the Management Program Equivalency

I appreciate your consideration.

Best,

Zack

**From:** [Sydney Howard](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7 Public Commentary  
**Date:** Thursday, April 14, 2022 4:18:28 PM

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To the Advisors and Board members of the Atlantic States Marine Fisheries Commission:

My name is Sydney Howard. I am a student, currently living in Massachusetts. I do not fish for Striped Bass regularly, but appreciate the fish for their beauty and what they bring to the coastal communities here in MA. Every marine community up and down the coast has a large section of the local economies around the Striped Bass. People from around the country come here to fish for these amazing creatures. For that reason, I feel that they need to be managed for abundance. Protecting striped bass stocks, safeguarding the recreational angling industry that relies on these fish, and ensuring that future generations of anglers can enjoy catching our coastal fishery are paramount. With this said, I wish to support the following options in the current Amendment 7 draft:

On 4.1 Management Triggers, I support:

- Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality
- Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold
- Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions
- Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, I support:

- Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method
- Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, I support:

- Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. We recognize this option may require more restrictive management measures than option A, which I support

On 4.4.2 Rebuilding Plan Framework, I support:

- Option B to allow the Board to take direct management actions as well as require public input, if the upcoming 2022 striped bass stock assessment update shows a less

than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, “Management program equivalency (also known as “conservation equivalency” or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

I believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically, I support:

- Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level
- Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates
- Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries
- Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

Thank you for providing the opportunity to comment on Amendment 7. I look forward to learning the outcome of the upcoming stock assessment and to reading the final version of the Amendment.

Sydney Howard

4/14/2022

Boston, MA

--

Sydney Howard  
508-782-8550

**From:** [Jake Naso-Kushner](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Thursday, April 14, 2022 4:16:41 PM

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My name is Jake Naso-Kushner and I am an avid surfcaster from the state of New York. I consistently take between 75 and 100 outings per year with Striped Bass being my primary target species. In my years of fishing, I have noticed a steep decline in the amount and size of Striped Bass over the last ten years. I urge the Commission to take all steps needed to preserve and protect the Striped Bass fishery. This includes but is not limited to shorter seasons, closed seasons, closed areas and increased size limits. Please stand up for the Striped Bass and end overfishing as quickly as possible. Please manage stripers for abundance, and not yield!

Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Jake Naso-Kushner  
Ocean Beach, New York  
Email: [birdshark@gmail.com](mailto:birdshark@gmail.com)

From: [Vasilios Siklas](#)  
To: [Comments](#)  
Subject: [External] Striped bass regulations  
Date: Thursday, April 14, 2022 4:14:53 PM  
Attachments: [IMG\\_2182.PNG](#)

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Hello

My name is Vasilios Siklas

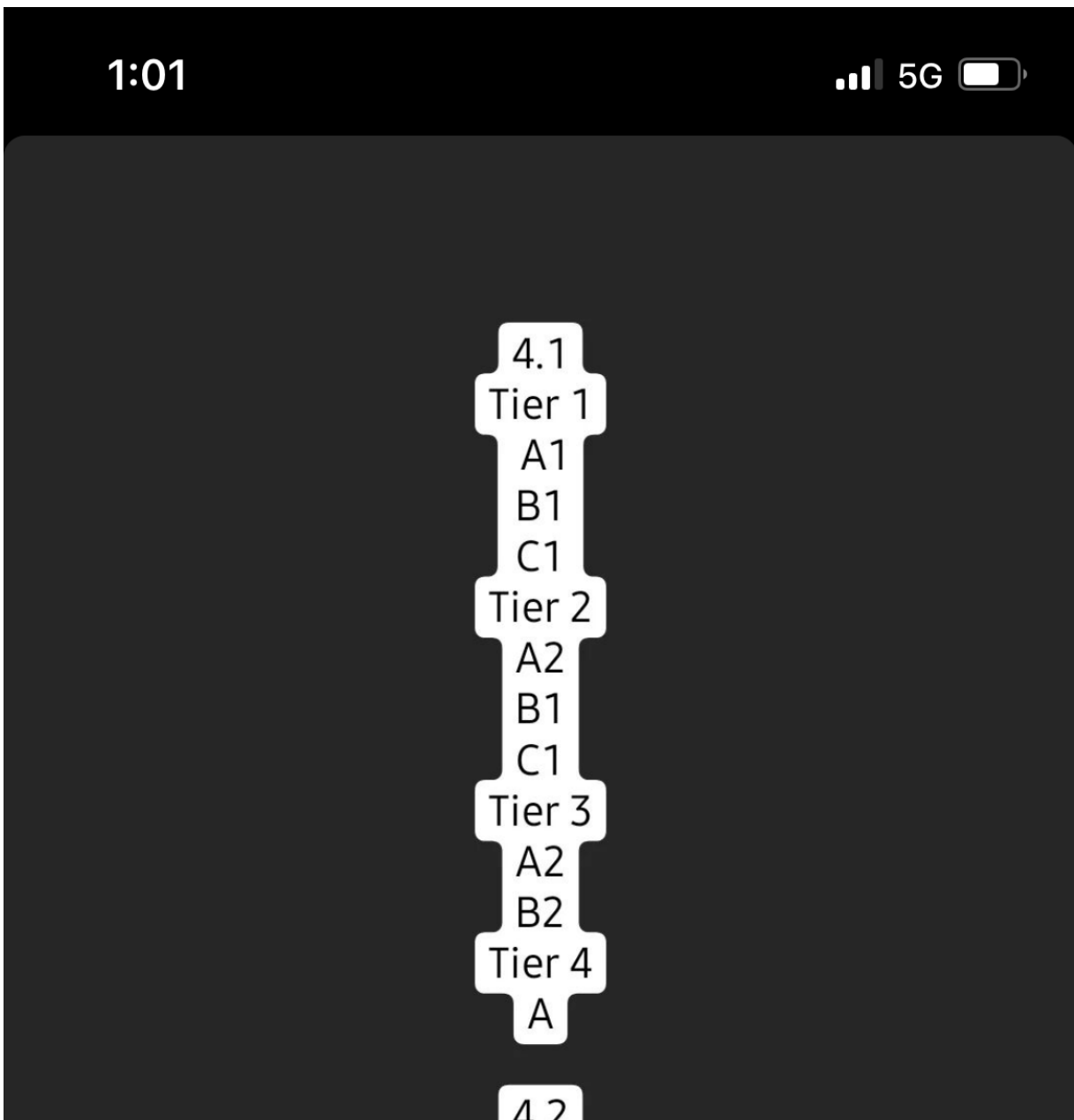
I live in new York and fish for striped bass from Mass to Jersey

It's sad to see the decline in fish populations

In my world the perfect solution is to make them a game fish and halt all killing of the striped bass

I don't believe each state should have a say as that defeats the purpose of protecting these migratory fish

If not considering them a game fish we must do whatever we can to protect them



T.4  
B- None  
C1, C2  
D2

4.4.1  
B

4.4.2  
B

4.6.2  
B1-a  
C3  
D2  
E2

Here are my choices for amendment 7  
Thank you for your time

[Sent from Yahoo Mail for iPhone](#)



**From:** [Anthony Milito](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 4:14:02 PM

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Hello,

My name is Anthony and I am a resident of New Jersey.

Here are my choices for amendment 7 section 4.6.2 (management of striped bass) requested by the asfmc call for public comment:

**4.6.2**

B1 (a)

C3

D2

E2

Please act fast to save our stripers!

Thank you,  
Anthony Milito

**From:** [Malcom Gewirz](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 4:09:44 PM

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To Whom It May Concern,

Striped Bass are a labour of love. Every year they bring millions into the economy of countless communities across the east coast from Maine all the way to beyond Virginia. These fish are worth far more alive than they are dead not only to fishermen, but to the economy. The cost a fisherman would happily spend to catch a 30+ pound fish is far more than that fish would fetch even if it was going for top dollar at market. Don't be an idiot and let history repeat itself, consider the recreation that brings anglers into local economies that goes beyond fishing. Restaurants, housing, hotels all benefit from good recreation and tourism every year and taking out or limiting a key gamefish species in each ecosystem will have a direct correlation to tourism numbers along the entire East coast each summer.

Best,  
Malcom Gewirz  
Middletown, Rhode Island

**From:** [Peter Vandergrift](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 4:08:02 PM

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I am writing to comment on draft amendment 7 and the options therein, but first I would like to make an overall statement. I am part of the fishing tackle manufacturing industry and am a life-long catch and release angler. The striped bass fishery has fallen into neglect as we have seen fish stocks decimated by environmental catastrophe, forage fish depletion, and overfishing. It is the ASMFC's duty to consider the fishery first and then for the angler and angling community. If drastic measures must be taken, I urge the board to not wince and to take those measures.

Specifically I am interested in the following options:

#### **4.1**

##### **I support:**

Tier 1

Option A: Timeline to Reduce F to the Target: Sub-Option A1

I would like for the board to move quickly and with the shortest framework to act.

Option B: F Threshold Triggers: Sub-Option B1

Follows the speedier framework of option A1

Option C: F Target Triggers Sub-Option C1

Again, I support this because it triggers in the least amount of time.

Tier 2

Option A: Deadline to Implement a Rebuilding Plan– Sub-Option A2

Again, the speediest timeline

Option B: SSB Threshold Trigger Sub-Option B1

If Female striped bass are in trouble, so is the entire recruitment.

Option C: SSB Target Trigger Sub-Option C1

Shortest Time frame to act

Tier 3

Option A: Recruitment Trigger Definition Sub-Option A3

I support a more sensitive trigger definition.

Option B: Management Response to Recruitment Trigger Sub-Option B2

Quick adjustment for tripping fish mortality triggers

Tier 4

Option A

No deferments please. Kicking the can down the road helps nothing.

#### **4.2**

Option B Effort Controls (seasonal closures)

Sub-Option B2-b.

I support no-target spawning closures. Let's leave these spawners alone when they are trying to reproduce.

Option C. Additional Gear Restrictions

Sub-Option C1 or C2

Especially if these fish are going to be released we should give them every opportunity to swim away as healthy as possible.

Option D. Outreach and Education

Sub-Option D1

States should absolutely use license money to educate anglers on best catch and release practices.

**4.4.1 and 4.4.2**

Option B for both

Rebuild Female SSB by no later than 2029 and giving the board the ability to adjust to meet the requirements is vital.

**4.6.2\**

**Option B- Sub-option B1-a**

**Option C-Sub-option C3**

**Option D- Sub-option D2**

**Option E- Sub-option E2**

If we can't do away with CE, let's limit the effect they can have on the management process.

Thank you for your time.

*Peter Vandergrift*

**CMO | Cheeky Fishing | Wingo Outdoors**

**North Adams, MA | Missoula, MT**

**[pvandergrift@northpointbrands.com](mailto:pvandergrift@northpointbrands.com)**

**C: 406.240.3086**

**[cheekyfishing.com](http://cheekyfishing.com) | [wingooutdoors.com](http://wingooutdoors.com)**



**From:** [Adam Leman](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 4:06:15 PM

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Good afternoon to members of the Commission,

My name is Adam Leman and I am emailing from my home in Chapel Hill, North Carolina. I am a biologist and an avid angler. I am emailing to you specifically about Amendment 7 and to voice my strong support for measures to be put into place to preserve the Atlantic Striped Bass populations and to express my dissatisfaction that the Commission has not offered to put into place the strongest sets of protections possible.

To directly address Amendment 7:

Management Triggers

I support moving mortality triggers to extreme sensitivity, meaning that the Commission must follow the data to ensure that the populations are not damaged to the point of no return. To this effect, I support **Tier 1 Options A1, B1, and C1**. Options without a quick trigger have no place in fisheries management.

For Tier 2 triggers, I must again emphasize that waiting for things to get worse will only allow them to get worse, to that end, I support **Tier 2 Suboptions A2, B1, and C1**. If the SSB collapses, the reproducing populations of Stripers are going to be further than ever from conservation goals.

Regarding TIER 3 Recruitment Triggers, these appear to be wildly miscalibrated. Therefore, I support **Tier 3 Suboptions A3 and B2**.

Regarding TIER 4 OPTIONS: Deferred Management Action - There should be No Deferred Management Plan, I support **option A**. If deferred, the problems only mount.

4.2 Recreational Fishery Management Measures - I support sensible regulation to keep spawning fish protected, both by location and temporally. Therefore, I support Option B. Effort Controls (Seasonal Closures) **Suboption B2 and B2-b**. Keep spawning fish protected.

Option C. Additional Gear Restriction, I support **Sub-Options C1 and C2**. Allowing fish to have the best chance of survival after catch-and-release is the way to go. As a trout fisherman, one can see in a small body of water how catch-and-release treatment has an enormous impact on fish survival.

Option D. Education and Outreach. **Suboption D1** is important to continue a high level of education for anglers. To require this is one of the only ways to ensure it gets done.

Regarding the Rebuilding Plan, I support **4.4.1 Option B and 4.4.2 Option B**. Time is of the essence to save the fishery for my kids and your kids.

Regarding 4.6 ALTERNATIVE STATE MANAGEMENT REGIMES - A unified effort is required to save the fishery. I strongly support coordination and unification of regulations without letting states choose their own CE. To that end, I support the following:

4.6.2 Option B. Restrict the Use of Conservation Equivalency Based on Stock Status

**Suboption B1.**

4.6.2 Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals **Suboption C3.**

4.6.2 Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries **Suboption D3.**

4.6.2 Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries **Suboption E2.**

I am 38 years old and have lived all over the East Coast. In my relatively short lifetime I have seen fisheries collapse and ecosystems change. Striped Bass are an economically important fish, but they are a representation of the ocean and river systems they call home. We need to protect them. Long gone are the days of early Colonists bragging about their abundance, but we need to ensure a long and bright future for East Coast Striped Bass by being proactive protectors and enjoyers of this powerful and beautiful fish.

Best regards,  
Adam Leman, Ph.D.  
Chapel Hill, NC

**From:** [mariusz](#)  
**To:** [Comments](#)  
**Cc:** [2022stripercomments@gmail.com](mailto:2022stripercomments@gmail.com); [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Thursday, April 14, 2022 3:47:37 PM

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To the ASMFC

My name is Mariusz Pajecki from Cambridge, Massachusetts and I am responding to the request for public comments on Amendment Seven for the management of striped bass.

I am a freshwater fisherman my whole life and started saltwater fishing couple years ago thanks to striped bass. I am a surfcasting fisherman fishing for striped bass during days and nights from shore, beaches, piers, inlets, breachways, back bays, Cape Cod Canal, etc spanning across couple of states in New England.

It seems striped bass fishery is in very bad shape and continue to be overfished from all the information I gathered.

I must say the current state of fishery and its future is not very positive for me personally and my passion but it will have even bigger impact on all the local tackle shops considering the gear prices in that sport - single reel can reach over \$1000. With so many anglers in that space that chose this type of fishing and amount of money spent on multiple reels, rods, gear that can reach \$5000+ yearly from a single fishermen, it's quite clear on how impacted those businesses will be when there is no fish to catch. Those fish are already much harder to find and catch compared to, for example, 10 years ago.

Please manage stripers for abundance.

Here are my choices for each proposed regulation.

- 4.1
  - Tier 1
    - A1
    - B1
    - C1
  - Tier 2
    - A2
    - B1
    - C1
  - Tier 3
    - A2
    - B2
  - Tier 4
    - A
  - 4.2
    - B- None

- C1, C2
  - D2
- 4.4.1
  - B
- 4.4.2
  - B
- 4.6.2
  - B1-a
  - C3
  - D2
  - E2

Thank you

Mariusz Pajecki



**From:** [Jordan Lang](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 Comments  
**Date:** Thursday, April 14, 2022 3:42:23 PM

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To Whom It May Concern:

My name is Jordan Lang, I am an avid recreational saltwater fisherman in Kittery Maine. I am writing to provide my comments on the draft amendment 7 in an effort to drive sustainability and abundance in the striped bass fishery. Thank you for allowing me the opportunity to make my voice heard.

Over the last several years I have experienced a concerning decline in the quantity and size of striped bass in my region. Like many recreational anglers, I contribute thousands of dollars annually to the economy to continue doing what I love. It is my opinion that striped bass are far more valuable as a game fish than they are for consumption, and that by managing for abundance, the ASMFC can ensure continued economic growth in the recreational fishing industry.

One point of emphasis I'd like to make is that I am fundamentally opposed to conservation equivalency. This is a shared resource, and no state should have the ability to make independent decisions that will impact the stock as a whole.

Below are my comments as they relate to the draft amendment 7:

#### **4.1 Management Triggers**

##### **Tier 1: Fishing Mortality (F) Triggers**

Option A: Timeline to Reduce F to the Target

I am in favor of sub-option A1 (status quo): Reduce F to a level that is at or below the target within one year.

##### **Option B: F Threshold Triggers**

I am in favor of Sub-option B1 (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

##### **Option C: F Target Triggers**

I am in favor of Sub-option C1 (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

##### **Tier 2: Spawning Stock Biomass (SSB) Triggers**

##### **Option A: Deadline to Implement a Rebuilding Plan**

I am in favor of Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan.

The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

#### **Option B: SSB Threshold Trigger**

I am in favor of Sub-option B1 (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

#### **Option C: SSB Target Trigger**

I am in favor of Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

### **Tier 3: Recruitment Triggers**

#### **Option A: Recruitment Trigger Definition**

I am in favor of Sub-option A2: The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

#### **Option B: Management Response to Recruitment Trigger**

I am in favor of Sub-option B2. If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

### **Tier 4: Deferred Management Action**

I am in favor of Option A (status quo): No Deferred Management Action.

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

## **4.2.2 Measures to Address Recreational Release Mortality**

### **Option C. Additional Gear Restrictions**

I am in favor of Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or

assist in the releasing of a striped bass.

I am in favor of Sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

#### **Option D. Outreach and Education**

I am in favor of Sub-option D2: It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

### **4.4 Rebuilding Plan**

#### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

I am in favor of Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

#### **4.4.2 Rebuilding Plan Framework**

I am in favor of Option B: 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 recruitment assumption specified in Amendment 7) 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.

### **4.6.2 Management Program Equivalency (Conservation Equivalency)**

#### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

I am in favor of Sub-option B1-a: CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

#### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

I am in favor of Sub-option C3: CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

#### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

I am in favor of Sub-option D2: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

**Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

I am in favor of Sub-option E2: the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Thank you again for allowing me to share my thoughts on the subject.

Best Wishes,

Jordan Lang

**From:** [Michael Galli](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 3:36:25 PM

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Dear Ms. Franke and members of the ASMFC Board,

Thank you for the opportunity to comment on this amendment, and for taking the time to hear the opinions of so many fishermen.

While I do not profit from these fish, as a recreational angler in Maine, this fishery is extremely important to me, and I want to see it preserved and improved for generations to come.

Below are the issues I support in this Amendment.

#### **4.1 Management Triggers**

##### **Tier 1: Fishing Mortality (F) triggers**

##### **Option A: Timeline to Reduce F to the Target**

I support **Sub-option A1 (status quo)**

##### **Option B: F Threshold Triggers**

I support **Sub-option B1 (status quo)**

##### **Option C: F Target Triggers**

I support **Sub-option C1 (status quo)**

##### **Tier 2: SSB Triggers**

##### **Option A: Deadline to Implement a Rebuilding Plan**

I support **Sub-option A2**

##### **Option B: SSB Threshold Trigger**

I support **Sub-option B1 (status quo)**

##### **Option C: SSB Target Trigger**

I support **Sub-option C1 (status quo)**

##### **Tier 3: Recruitment Triggers**

##### **Option A: Recruitment Trigger Definition**

I support **Sub-option A2**

##### **Option B: Management Response to Recruitment Trigger**

I support **Sub-option B2**

## **Tier 4: Deferred Management Action**

I support **Option A (status quo)**

### **4.2.2 Measures to Address Recreational Release Mortality**

I support **Sub-options C1 & C2**

#### **Option D. Outreach and Education**

I support **Sub-option D2**

## **4.4 Rebuilding Plan**

### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

I support **Option B**

### **4.4.2 Rebuilding Plan Framework**

I support **Option B**

## **4.6.2 Management Program Equivalency**

### **Option B. Restrict the Use of Conservation Equivalency Based on Stock Status**

I support **Sub-option B1-a**

### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

I support **Sub-option C3**

### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

I support **Sub-option D2**

### **Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

I support **Sub-option E2**

Thank you again for taking the time to hear our voices,

Michael Galli

**From:** [Cam Boll](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 3:36:03 PM

---

Hello,

I am reaching out to express my overwhelming **support of Amendment 7**. I have been recreationally fishing striped bass all of my life (I am 31), and have always practiced safe catch and release. Coming from trout fly-fishing, I now try to barely take bass I catch out of the water and use barbless hooks. All that being said, I am positively for any further management efforts that can take place - including windows that exclude fishing for striped bass altogether (catch and release or not). I am genuinely concerned about the state of the stock and want to help preserve these fish and their habitats into the future.

Sincerely,  
Cameron Boll

**From:** [john rowley](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 3:28:30 PM

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To whom it may CONCERN,

I have been a lifelong angler and serious striped bass fisherman for over 20 years. I am in favor of immediately implementing a reduction in quota in order to begin the recovery. Action should be taken without delay. I am not opposed to further restrictions on the taking of striped bass, but I am opposed to the commercial fleet getting the free pass. Simple economics shows how much more valuable a living fish is compared to a dead one. The money from the recreational fishery far exceeds (by over 6 billion dollars) the value of the commercial quotas.

I am also opposed to the current slot limit and the conservation equivalence that is abused by all states. The current slot limit is going to decimate the largest class of fish we have left. I think it is setting the stage for a time when we have few small fish and even fewer large fish. Move the regulations back to 1@36" and do us all a favor. We need to make this the requirement for all states and end the conservation equivalency loopholes.

I also believe there should be a closed season on striped bass fishing during the spawning period. It makes very little sense to hammer these fish during the spawn.

Thank you,  
John Rowley

[Sent from Yahoo Mail for iPhone](#)



**From:** [Abbey Littman](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 3:22:22 PM

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Dear Atlantic States Marine Fisheries Commission Striped Bass Board-

I am writing in support of aggressive action to protect the Striped Bass population.

I am relatively new to fly fishing, but it is something I love to engage in here in coastal RI. Luckily (maybe unluckily!) my husband is an avid angler, and has taught me safe handling techniques and the importance of catch and release practices. Without his expertise I would have not had access to such education, and I hope that you all vote to make education more readily available to the many people recreationally fishing.

Secondly, I hope that you all take aggressive action to protect this fishery, as it is clearly in danger for the generations to come. I want the future generation to experience the joy of a bass blitz at sunset on the South Shore and the strange sound that Striper's make on a warm early spring day at the worm hatch. I want my children to grow up in awe of the magnificent colors we see on bass, and how they change depending on their environment. These experiences are what give our lives meaning. Sure, my everyday fishing practices are important, as is passing down knowledge from generation to generation, but what really is necessary to prevent a further crash of the bass population is bold regulatory action.

Since Amendment 6 was adopted in 2003 the stock has declined to overfished levels because excessive overfishing has been allowed. I feel that some significant changes are needed to reverse this trend, and that the overall goals for Amendment 7 should be to recover the Striped Bass stock as soon as reasonably possible and to implement policies to ensure target levels are maintained long-term after recovery.

To accomplish these goals, I urge the Board to include the following options in Amendment 7:

4.1 Management Triggers

Tier 1 - A1, B1, C1

Tier 2 - A2, B1, C2

Tier 3 - A2, B2

Tier 4 - A

4.2.2 Recreational Release Mortality

Sub-Options C1, C2, D2

4.4 Rebuilding Plan

4.4.1 Option B

4.4.2 Option B

4.6.2 Management Program Equivalency

Sub-options B1-a, C3, D2, E2

As the board making this decision, the fate of the Striped Bass Fishery is largely in your hands, and I sincerely hope you take these suggestions to heart.

Best,  
Abbey Littman



**From:** [alexcarau@outlook.com](mailto:alexcarau@outlook.com)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 3:13:17 PM

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Stripers should be declared a gamefish. Eliminating the commercial fishing and allowing only catch and release for a year in the recreation fishery would go a long way to creating a sustainable fishery.

Enforcing the laws with onerous fines and taking of gear for ordinance violations is also important.

Striped bass are a revered fish traveling through many jurisdictions. We need similar regulations throughout the span of the annual migration. The goal should be to guarantee the survival and abundance of the species, not deciding how many can be taken and barely keeping the species viable.

In short, it is time to be courageous. There are an abundance of jobs in the US, and it is a good time to divert people from the harvest of stripers to other vocations. It is easier to accomplish in an robust economic period such as now.

Alex Arau  
Rockport, ME

**From:** [Jay Howland](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 3:10:29 PM

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Please save this species as its one of the best sport fish in the midwest. Stripe bass are abundant but numbers seem to be down lately and i hate to see this species disappear from out waters ...

**From:** [James Rakowski](#)  
**To:** [Comments](#)  
**Subject:** [External] Comments on Amendment 7  
**Date:** Thursday, April 14, 2022 2:59:01 PM

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Thank you for to opportunity to comment on the proposed amendment on the management of striped bass. My preferred options are as follows:

4.1  
Tier 1  
A1  
B1  
C1

Tier 2  
A2  
B1  
C1

Tier 3  
A2  
B2

Tier 4  
A  
4.2  
B none  
C1 C2  
D2  
4.4.1  
B  
4.4.2  
B  
4.6.2  
B1A  
C3  
D2  
E2

Our striped bass stock is depleted and needs added protection. Please take immediate action.

James Rakowski  
40 North Falmouth Hwy  
Falmouth MA 02556

Sent from my iPhone

**From:** [William Prodouz](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 2:54:00 PM

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I am writing as a concerned striped bass fisherman with over 55 of striped bass fishing experience including the last 8 as a retiree, living on Cape Cod and fishing the Cape Cod Canal and 25 years fishing the surf and estuaries from Westerly RI to Portland ME.

We have a problem. Fewer quality striped bass, fewer juvenile striped bass and gaps in the year classes. Action is required thus more stringent and more timely actions will be the ones that the management strategy should include.

I will add a few specific comments:

Tier 1 Options: Fishing Mortality F Triggers

I support a strategy that manages to a target reference point more conservative than the threshold (overfishing) reference point.

I support A2

I support B1 (status quo)

I support C1 (status quo)

Tier 2 Options Female spawning biomass management triggers

I support A2

I support B1

I support C1

Tier 3 Options: Recruitment triggers

I support A3. Juvenile indices have a long history of being a good predictor of the future of the striped bass fishery . It's use should be increased.

I support B2

Tier 4 Options: Deferred Management Action

NO NO NO. No delays whatsoever. There have been too many delays.

I support Option A status quo

4.2 Recreational Fisheries Management Measures

I support 4.2.2 the use of size limits , bag limits and seasons

4.2.2

I support circle hook usage

Please study seasonal and spawning closures and develop a plan for review

I support option c additional gear restrictions

I support option C1 as it is already used in MA

I oppose C2 and D

4.3 Commercial should be further reviewed

4.4.1 Recruitment Assumption

I support Option B, we have a recruitment issue.

4.4.2 Rebuilding Plan Framework

The stocks are in terrible shape and could be worse as new measures are published. ASMFC must be ready for quick action if our expected emergency worsens.

4.6 Conservation Equivalency

Again, NO, NO NO.

But if ASMFC wants to avoid the real work that needs to be done and has to have a CE option it must be stricter than no CE and must be measurable and stopped immediately if desired results do not occur.

Thank you ASMFC for doing the best with limited data and multiple political jurisdictions and varying financial interests to deal with.

REMEMBER THERE IS NO ECONOMIC OR RECREATIONAL BENEFIT IF THERE ARE NO STRIPED BASS AND FISHERMAN ABLE TO FISH FOR THEM. DO THE MOST YOU CAN AS FAST AS YOU CAN AND ERR ON THE SIDE OF SAVING THE STOCK.



Virus-free. [www.avast.com](http://www.avast.com)

**From:** [Paul Dixon](#)  
**To:** [Comments](#)  
**Subject:** [External] Fwd: " Amendment 7  
**Date:** Thursday, April 14, 2022 2:52:25 PM

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>>>>

>>>>

>>>> Dear Atlantic States Marine Fishery Commission

>>>>

>>>> I have been a boat captain in Montauk for close to 30 years and can remember the last time that Striped Bass was in dire straights , but through a Moratorium recovered to become one of the greatest Conservations success stories of of all time.

>>>> Now we are looking at a collapsing striped bass fishery AGAIN... Mother-nature may take some of the blame and ecological degradation part of the blame but in my humble opinion ASMFC must shoulder a lot of the blame. By not adhering to guidelines set in your own charter and not erring on the side of caution or enacting quicker action when deemed overfished years ago, you have failed in your mission.

>>>> The Striped Bass is to important to the regional communities up and down the coast to be mismanaged. I believe we need to enact the most stringent guidelines to ensure that there are plenty of Striper left in the water to ensure that there are fish for everyone. No one will have a job if the Striped Bass is gone.

>>>> In regards to Amendment 7 here is what I believe should be implemented

>>>> 4.1 Management Triggers

>>>> Tier 1: Fishing Mortality (F) Triggers

>>>> Option A: Timeline to Reduce F to the Target

>>>> Sub-option A1 (status quo):

>>>> Option B: F Threshold Triggers

>>>> Sub-option B1 (status quo

>>>> Option C: F Target Triggers

>>>> Sub-option C1 (status quo

>>>> Tier 2: Spawning Stock Biomass (SSB) Triggers

>>>> Option A: Deadline to Implement a Rebuilding Plan

>>>> Sub-option A2

>>>> Option B: SSB Threshold Trigger

>>>> Sub-option B1 (status quo)

>>>> Option C: SSB Target Trigger

>>>> ASGA Supports Sub-option C1 (status quo

>>>> Tier 3: Recruitment Triggers

>>>> Option A: Recruitment Trigger Definition

>>>> Sub-option A2

>>>> Option B: Management Response to Recruitment Trigger

>>>> Sub-option B2

>>>> Tier 4: Deferred Management Action

>>>> Option A (status quo)

>>>> 4.2.2 Measures to Address Recreational Release Mortality

>>>> Option C. Additional Gear Restrictions

>>>> Sub-option C1

>>>> Sub-option C2

>>>> Option D. Outreach and Education

>>>> Sub-option D2

>>>> 4.4 Rebuilding Plan

>>>> 4.4.1 Recruitment Assumption for Rebuilding Calculation

>>>> Option B

>>>> 4.4.2 Rebuilding Plan Framework

>>>> ASGA Supports Option B:

>>>> 4.6.2 Management Program Equivalency (Conservation Equivalency)



>>> Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status  
>>> Sub-option B1-a  
>>> Option C  
>>> Sub-option C3  
>>> Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries  
>>> Sub-option D2  
>>> Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries  
>>> Sub-option E2: the percent reduction/liberalization projected for the FMP standard at the state-specific level.  
>>>  
>>> Thank you all for your consideration and I hope you err on the side of Caution and save Americas Iconic Striped Bass.  
>>> Sincerely, Captain Paul Dixon  
>>>  
>>>  
>>> Sent from my iPad

**From:** [Anthony Bjelke](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 2:46:34 PM

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I stand by and support draft amendment 7

[stripercomments@gmail.com](mailto:stripercomments@gmail.com)

**From:** [Paul Barrile](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Thursday, April 14, 2022 2:41:37 PM

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To the ASMFC

My name is Paul Barrile. I live in Tiverton, Rhode Island and I would like to share my thoughts in regard to Striped Bass management. I believe that striped bass should be managed for abundance now and forever. I only started fishing for stripers about 15 years ago but once I started, it was one of those "where have you been all my life" situations. It is truly something that my life needs. The wind in your face, the waves breaking around you, the smell of the salt air and the seaweed. It gives a break from the daily grind and offers an opportunity to reconnect with the natural world. Striper fishing is one of the few that allows for a person to fish when they have time. It doesn't have to be done at the crack of dawn or the middle of the day, when many of us are working. It can be done at those times but night time, after the kids go to sleep for instance, is an option which allows someone like me to spend the time I want with my wife and kids while also still being able to enjoy my passion for striped bass fishing. I will admit that I am not the best fisherman. I don't catch a ton of fish, enough to keep me coming back but by no means do I have it figured out. I do very much enjoy the challenge that is presents and trying to figure out how to catch more and bigger fish but i also find myself, while i am out fishing, standing there not casting and just taking in what's around me. The beaches, the rocks, the water, the wildlife, the boats, the sky, the list could go on. Simply by going out fishing for stripers, I have developed a connection to the places I fish, places I may not have gone if it weren't for fishing. I have brought trash bags with me to carry out trash I have found and have taught my kids and some of their friends about the importance of maintaining the things and places that are important to you. My kids are 14 & 4. My 14-year-old has fished with me a few times over the years, and I remember the first time she casted on her own and caught a schoolie like it was yesterday. She was 9, it was November, and she was over the moon that she had done it herself. My 4-year-old has been telling me all winter about how he is going to catch a "striper fish" this year and i hope he gets bitten by the fishing bug like I have. I look forward to teaching my kids and hopefully someday grandkids what I know about striper fishing but the fish need to be there for that to be an option. Its the dream of a dad to be able to fish with his kids for as long as possible, bonding over good days and bad days, sharing stories, visiting new and old spots and continuing to develop a love for the fish and the places you encounter them. But the fish have to be there for that to happen. The striped bass is

such an iconic fish in this area. It can be fished for by anyone with the most basic of tools or the most elaborate of rigs. It doesn't require a boat, anyone can walk down to the water and have a shot at catching one. But the fish need to be there, too much of a good thing does not apply to striped bass, there is no too much. Abundance is the way to go for this fish, let the future generations have the chance to fall in love with them the way we all have.

Listed are the choices that I support for each proposed regulation:

#### **4.1**

Tier 1

Option A - A1

Option B - B1

Option C - C1

Tier 2

Option A - A2

Option B - B1

Option C - C1

Tier 3

Option A- A2

Option B - B2

Tier 4 - A

#### **4.2**

Option B - do not support any

Option C - C1 & C2

Option D - D2

#### **4.4.1**

Option B

#### **4.4.2**

Option B

**4.6.2**

Option B - B1-a

Option C - C3

Option D - D2

Option E - E2

Thank you for taking the time to consider my thoughts and feelings in your decisions.

Paul Barrile

**From:** [jah@twylatharp.org](mailto:jah@twylatharp.org)  
**To:** [Comments](#)  
**Subject:** [External] amendment 7  
**Date:** Thursday, April 14, 2022 2:30:57 PM

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as a new york state angler, please allow the following to be registered as my positions on amendment 7:

Here are the options I choose:

Tier 1: Fishing Mortality Triggers

Sub Option A1

Threshold Triggers:

Sub Option B1

Target Triggers:

Sub Option C1

Tier 2:SSB Triggers

Sub Option A2

SSB Threshold Trigger:

Sub Option B1

SSB Target Trigger:

Sub Option C1

Recruitment Trigger:

Sub Option A2

Management Responses to Recruitment Trigger:

Sub Option B2

Tier 4: Deferred Management Action

Option A – NO DEFFERMENT!

Recreational Release Mortality:

Sub Option B2 – Seasonal Closures

Sub Option C1

Sub Option C2

Outreach and Education:

Sub Option D2

Recruitment Assumption for Rebuilding Calculation:

Option B

Rebuilding Plan Framework:

Option B

Management Plan Equivalency:

Sub Option B1-A

Sub Option C3

Sub Option D2

Sub Option E2

jesse.

**From:** [Paul Quigley Andrews](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 2:27:25 PM

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**April 14, 2022**

## **Atlantic States Marine Fisheries Commission**

Thank you for your efforts in managing striped bass and for the opportunity to comment on Draft Amendment 7. I grew up fishing the Chesapeake Bay out of Solomons Island, Maryland – and didn't even see a striped bass there until I was in my teens (in the mid-90's). The dramatic increase in the coastal abundance has been remarkable, and I hope the Commission uses the current amendment process to take appropriate additional measures now to ensure the continued vitality of the species.

I currently live in Brooklyn, NY, and fish recreationally; primarily in NYC harbor waters, Long Island sound, and along the Atlantic coast to Martha's Vineyard/Nantucket. In 2021 I took ~80 fishing trips, and harvested ~2 smaller slot size fish a month to eat. Striped bass were either a primary target or secondary target on each of these trips when we were within 3 miles of land. Almost all of the fish caught off our boat are released; and most are caught on artificial lures. Occasionally we target stripers with live menhaden that are bridled with a single circle hook.

I have two main comments to the draft: conservation equivalency and recreational mortality.

### **Conservation Equivalency**

The use of conservation equivalency should be minimized and/or eliminated, restricted based on stock status, and should have a required uncertainty buffer. I believe New Jersey's current use of conservation equivalency to allow the taking of 36" and 37" fish to be illogical and counterproductive to the Commission's management efforts to reduce overfishing.

First, the state claims it is "less than 38 inches", but I've seen and heard it referred to as 28"-38" enough times—putting aside the state's undersized bonus program too—that there is no doubt in my mind that 38" fish are being harvested.

Second, as a practical matter, currently in NYC harbor and Raritan Bay, anglers who launch from New Jersey can take those larger fish, including out of New York waters; yet anywhere else north of these waters (and from NY based anglers); those female breeders are safe from recreational harvest.

In the last two years the amount and concentration of >35" fish in these waters has been inspiring. I fear this NJ loophole will have dramatic negative impacts on this population of what should be safe fish under current recreational regulations, and allow for continued overfishing that will not be recognized until it is too late.

The Commission should select:

- Option B, Sub-option B1-a;
- Option C, Sub-option C3;
- Option D, Sub-option D2;
- Option E, Sub-option E2.

### **Recreational Mortality**

I do not think additional recreational effort controls should be implemented in the absence of updated studies that confirm a 9% or higher recreational release mortality rate under current fishing practices and gear (i.e., only after the 1996 study that is referenced is confirmed). In the



interim, I am in favor of additional gear restrictions, and mandating that states promote best striped bass handling practices.

The Commission should select:

- Option C, Sub-option C1;
- Option C, Sub-option C2;
- Option D, Sub-option D1.

Thank you for your consideration,

Paul Q. Andrews  
Brooklyn, NY

**From:** [NORMAN HYETT](#)  
**To:** [Comments](#)  
**Subject:** [External] Public Comment: Amendment 7  
**Date:** Thursday, April 14, 2022 2:25:41 PM

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As a avid fisherman who releases all fish, I cannot stress enough how important it is to protect the striper stock. While fishing in Boston Harbor daily, I have witnessed menhaden being netted by the ton, with striped bass being tossed overboard dead as a consequence. The striper fishery is in trouble, and without protection it will be lost.

Captain Norman Hyett  
617-909-0912

**From:** [John Liss](#)  
**To:** [Comments](#); [John Liss](#)  
**Subject:** [External] Stripe bass comments  
**Date:** Thursday, April 14, 2022 2:19:50 PM

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Dear SIRS.

I have been Striper fishing since I was 10 and I'm 75 today. I started my fishing in New Jersey, and after moving to New England and now to Newburyport, Ma, I continue this long tradition started by my father and uncles to fish the surf for Stripers. I have noticed that the Striper population is decreasing. I can still find the big girls ( fish over 40") but the small fish seem to be dramatically decreasing which does not bode well for the future. Here in Ma we start fishing in May and sometimes April and continue through Oct depending on weather and then we chase them to Rhode Island and finally back to New Jersey before we give up sometime before Christmas.

I see that you are getting a new amendment together and I'd like to record my preferences, they are as follows:

Tier 1 option A1,B1,andC1

Tier2 A2, B1, C1

Tier3 A2, B2

Tier4 A, B2-b, C1, C2,D2

4.4.1 B

4.4.2 B

4.6.2 I think CE should be done away with as all it does is allow certain units to take more fish than they should be taking.

I know that the decisions you are making are difficult but you MUST consider what is best for the fish and the fishery.

Regards,

John Liss

#8. 58th St

Newburyport, Ma. 01950

Striper117@comcast.net

Sent from my iPad

**From:** [danlevy10](#)  
**To:** [Comments](#)  
**Subject:** [External] AMENDMENT 7  
**Date:** Thursday, April 14, 2022 1:59:11 PM

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Simply put, Please pass AMENDMENT 7. Let's do it for our children, grandchildren, and the future of our planet. Every impact that we can affect, like AMENDMENT 7, can make a better future.

Daniel Levy  
Great Neck, Long Island

Sent from my Verizon, Samsung Galaxy smartphone

**From:** [Robert Yacoub](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 1:55:19 PM

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As a New York state striped bass surf fisherman I'd like to share my thoughts about the current fishery and efforts to protect and expand it. First of all, for me this year is not about "the fishery" but about the fish. When I hear talk about protecting the "the resource" for current and future anglers, recreational and commercial, I cringe a little. Yes I love fishing for and catching striped bass. It brings me immense enjoyment and I know it's a very important economic resource. But in the end I feel the fish themselves have a right not to be hunted to just marginal levels of existence. Whatever means it takes NOW to protect this beautiful creature and it's environment is what I am for. I am not informed as to all the real causes of mortality. I know I and almost everyone I know happily practices catch and release with care, and always will no matter the number of bass. We cannot be the main source, or even a significant source, of striper mortality. I reduce my treble hooks to one per lure at most, always crush my barbs and never take my fish out of the water. These things are probably not universally enforceable but regulations might help. As for commercial fishing, gill netting, bycatch, etc. I have no idea but my view is nobody has a god given right to make money off a species if it damages the the species to the point of near extinction. So if your regulations are meant to "manage the resource" please do so with the real interest of the striped bass at heart. We all have the first and last responsibility to do so.

Sent from my iPhone

**From:** [brandon Hakulin](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 1:50:06 PM

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Good day,

My name is Brandon Hakulin, I am a science teacher, Marine Corps veteran, and avid outdoorsan. I find peace in the outdoors, much of that peace comes from saltwater angling. I also spend money when I travel to fish and if the fishing is poor due to our management of my fisheries then I stay home and save money. I like to see large schools of striped bass of all sizes. In the late 80s and early 90s you couldn't catch a striped bass off the jetty in CT but due to strict regulations the bass came back. Unfortunately I missed the boom due to military service away from the area, et when I got into it some years later the bass were there, but on the decline again. Each year the bigger bass are less and numbers of fish decreases. My friends fishing the Hudson are complaining as well. Last year very few people even caught bass in the capital district where I live.

We want proper management of our fisheries. We want bigger fish and more of them. Please help us out and our bass.

I ask that you support 4.6.2 Sub options B1-a, C3, D2, E2. Also 4.1 Tier 1 sub options A1, B1, C1. Also 4.1 Tier 2 sub options: A2, B1, C1. Also Tier 3 sub options A2, and B2. Then Tier 4 sub options, C1, C2, D2. Finally I also ask that you support 4.4.1 and 4.4.2 Option B. You have the power to make a positive difference for a lot of fish and a lot of veterans that use fishing to disconnect and escape for a time. Please don't ruin it for us and our fish.

Thank you for your consideration and service,

Brandon F. Hakulin USMC

[Sent from Yahoo Mail on Android](#)

**From:** [John Bleck](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped bass  
**Date:** Thursday, April 14, 2022 1:49:55 PM

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Hello,

I am a recreational surf/boat fisherman out of Long Island NY who just loves everything these great fish brings to the coast. Over the years I have seen my local waters hold less fish and smaller size fish due to a number of factors. I can just say I'm willing to do my part as a catch and release angler who will improve my tactics to make sure I'm giving best chance for a fish to survive. I'm not against anyone taking a legal fish to harvest at all but definitely think that something needs to change to help rebuild of this amazing fish in our waters back. Everyone thrives and everyone smiles when they are at the best numbers in all different sizes to keep a healthy fishery in tact.

Thanks for listening,

John - just a regular fisherman from LI , NY

Sent from my iPhone

**From:** [seb](#)  
**To:** [Comments](#)  
**Subject:** [External] ASMFC Commission Attn: Emilie Franke  
**Date:** Thursday, April 14, 2022 1:39:37 PM

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My name is sebastien rondier. I am an avid surfcaster and part of the plug building and conservation minded community that grows larger every year. I entered this diverse community on the tail end of what seemed to be a great recovery in the 2011/2012 timeframe. I have a strong science background and a good understanding of data. While data drives decisions, or at least should; there is strong correlation to a “fisherman’s story” and how the biomass is suffering.

I cannot tell you how many times I have heard from a long-time surfcaster, or sharpie, how good it used to be.... This is almost the siren song of the Striped Bass fishermen. How good it used to be...

I have summarized my public comment, in support of each Option stated in the draft Amendment. I am concerned that somehow the commercial sector has not been considered at all in this document. There is heavy pressure on changing the regulations on the recreational sector, however it is negligent to assume the pressure put on Striped Bass by the commercial sector is any less detrimental. Numbers indicate rec people make up over double the harvest rate, but how is it possible to monitor and evaluate things like bycatch, bycatch release mortality, undersize release mortality, fishing method of take negligence (i.e. not checking nets, leaving nets in too long, gaffing, etc...)? This seems like a big oversight.

We have reached a point where mismanagement and greed have taken over sound science and understanding. Everyone will need to suffer in the short term in order to see a positive change. This is not lost on me, and I am in favor of it. Remember, IF THERE IS NO MORE STRIPED BASS COMMERCIAL FISHERMAN WON'T HAVE A JOB TO GO BACK TO. That goes for anyone that benefits in some small way from the sport or harvest of Striped Bass.

sebastien rondier

Public comment on the Tier options for Amendment 7:

**Tier 1 Option A** – Support Sub-Option 1 (status quo). The effort should not be delayed any more than 1 year.

**Tier 1 Option B** – Support Sub-Option B1 (status quo). Again, let’s make the adjustment time period as short as possible.

**Tier 1 Option C** – Support Sub-Option C1 (Status quo) – mortality should be assessed effectively, and a determination made in a shorter timeframe. Waiting for 3 years could effectively lead to collapse as data is collected.

**Tier 2 Option A** – Support Sub-Option A2 – A 2-year deadline will help to hold ASMFC parties, recreational anglers, and commercial fisheries accountable.

**Tier 2 Option B** – Support Sub-option B1 – obviously cannot support a nomangement trigger sub option.



**Tier 2 Option C** – Support Sub-Option C1 (status quo) – tighter timelines are more favorable. The population is obviously suffering already, why delay.

**Tier 3 Option A** – Support Sub-Option A3 – High sensitivity is needed to cause more frequent management of a suffering biomass.

**Tier 3 Option B** – Support Sub Option B2 – This seems to assume mortality based on an already low recruitment which would be conservative and triggers a tighter timeline for management programs.

**Tier 4** – Support Option A (status quo) – There should be no deferment, especially when the population is suffering and there is a data lag. This needs to hold responsible parties accountable.

## 4.2 Rec Management Measures and Options:

**Support Option B specifically Option B2-b** No Target Spawning closure required – the spawning fish need to be protected. How can you have a management trigger (SSB) if you don't protect them in the first place.

## 4.3 Commercial Fishery measures

While the recreational group represents the supposed high allotment of release mortality, it is ridiculous to not even reconsider the effect of mortality due to removal and bycatch of Striped Bass by the commercial sector. I support stringent recreational measure even to the point of a non-target or restriction of targeting Striped Bass. But to close down on the recreational angler and still allow commercial rigs to absolutely take advantage of a suffering population is ridiculous and shameful.

The management and enforcement bodies need to turn a fine focus on every party which utilizes our SHARED resource. How they are not considered only seems to support the assumption by many that the commercial fisheries remain a political card to be held by states, and to fund corrupt individuals in state government. Shameful.

### 4.4.1 Recruitment Assumption

**Option B support** – more conservative and will contribute to stricter management measures

### 4.4.2 Rebuilding Plan

Support Option B – rejecting the status quo will allow for voting and a reassessment of both commercial and recreational impact. This is a way to get the Commercial quotas evaluated and the bag limits, size/slots, among other things that somehow the Commercial sector was able to avoid in the general language of Amendment 7

### 4.6.2 Management Program Equivalency (CE)

**Support Option B** to restrict CE but encourage the removal of present CE programs sooner. States should not operate independently which encourages judgement outside of a likely biological and habitat based science and is heavily influenced by money and politics.

Sebastien  
Cell 646-369-7772

**From:** [Michael Porco](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 1:36:16 PM

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To Whom it May Concern,

Please see my comments and positions relating to section 4.1., 4.2.2, 4.4, and 4.6.2 of Draft Amendment 7. We must take action to conserve this valuable and fragile species from overfishing. Please consider my position as you make the decisions that affect anglers and most importantly the future of this noble species. I believe that the positions below will help to rebuild the stock and should be considered. Rebuilding and keeping a healthy stock is of utmost importance.

#### **4.1 Management Triggers**

Tier 1: Fishing Mortality (F) Triggers

Option A: Timeline to Reduce F to the Target

I support Sub-option A1 (status quo): Reduce F to a level that is at or below the target within one year.

Option B: F Threshold Triggers

I support Sub-option B1 (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

Option C: F Target Triggers

I support Sub-option C1 (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

Tier 2: Spawning Stock Biomass (SSB) Triggers

Option A: Deadline to Implement a Rebuilding Plan

I support Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

Option B: SSB Threshold Trigger

I support Sub-option B1 (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

### Option C: SSB Target Trigger

I support Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

### Tier 3: Recruitment Triggers

#### Option A: Recruitment Trigger Definition

I support Sub-option A2: The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

#### Option B: Management Response to Recruitment Trigger

I support Sub-option B2: If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

### Tier 4: Deferred Management Action

I support Option A (status quo): No Deferred Management Action.

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

## **4.2.2 Measures to Address Recreational Release Mortality**

### Option C. Additional Gear Restrictions

I support Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

I support Sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

### Option D. Outreach and Education

I support Sub-option D2: It is recommended states continue to promote best

striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

## **4.4 Rebuilding Plan**

### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

I support Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

### **4.4.2 Rebuilding Plan Framework**

I support Option B: 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 recruitment assumption specified in Amendment 7) 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.

### **4.6.2 Management Program Equivalency (Conservation Equivalency)**

Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status

I support Sub-option B1-a: CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals

I support Sub-option C3: CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries

I support Sub-option D2: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries

I support Sub-option E2: the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Thank you for considering my positions.

Warm Regards,

Mike Porco

**From:** [Whitney Tilt](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 1:34:34 PM

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We greatly appreciate the efforts of the Atlantic States Marine Fisheries Commission to address the documented declines in the interstate striped bass fishery. We recognize the complexity of addressing the management issues and the myriad of interests that have waded into this issue.

Lost amid the weight of details, however, is the simple declaration that proposed actions must focus first and foremost on rebuilding the striped bass stock. If there is any question of degree or timing, the required action must err on the side of the fish. Every year that we fail to achieve that goal makes it harder to achieve in subsequent years and exacts a greater hardship on the communities that benefit from the fishery.

We wish to provide the following specific comments that support this conservation-first approach:

Management Triggers. The recognized extended period of below average recruitment in recent years makes it clear that a new recruitment-based trigger must be designed appropriately to respond to observed declines in spawning success. In addition, when fishing mortality exceeds the established threshold, the striped bass management program must be adjusted to reduce fishing mortality to a level that is at or below the established target as quickly as possible.

Recreational Release Mortality. As recreational anglers, we recognize the importance of reducing recreational release mortality. Specifically, recreational anglers should be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass; and any striped bass caught on any unapproved method of take should be returned immediately to the water without unnecessary injury.

Conservation Equivalency. As the draft Amendment 7 makes clear, there is an essential tension between managing the striped bass fishery on a coastwide basis while affording states the flexibility to deviate from the FMP standard through conservation equivalency (CE). Given the current stock status CE programs should not be approved when the stock is at or below the biomass threshold (i.e., overfished); and CE programs should not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

As to further details concerning Amendment 7, we strongly support the comments submitted by the American Saltwater Guides Association (ASGA) who have committed their time and expertise to crafting a thoughtful and stewardship-based path forward.

Respectfully Submitted

*Whitney L Tilt*



Whitney Tilt | Executive Director  
406-223-8972 | [whitney.tilt@affta.org](mailto:whitney.tilt@affta.org) | [afftafishfund.org](http://afftafishfund.org)

**From:** [Steve Stefanski](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped bass  
**Date:** Thursday, April 14, 2022 1:28:01 PM

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Good afternoon

Education, enforcement and upgrading of striped bass regulations are of utmost importance to saving this natural and economic resource for generations to come.

In my opinion the trailing 3 year average of migratory fish and landings/releases needs to be constantly reviewed in order to properly maintain breeding class fish. One slot fish 28 to 38 inches should be allowed per day. I also dare to suggest that a closed season in breeding areas be initiated, I'm from NJ and I see what goes on in Raritan Bay.

Best regards

Sent from my iPhone



**From:** [Adrienne O'Donnell Lefeber](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Striped Bass Amendment 7 public commentary  
**Date:** Thursday, April 14, 2022 1:22:49 PM

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To the Advisors and Board members of the Atlantic States Marine Fisheries Commission:

My name is Adrienne O'Donnell. I am an avid recreational angler, currently living in Massachusetts. I am relatively new to Striped Bass fishing, after picking it up in 2015, but I enjoy it very much. As a female angler, I would expect to have the opportunity to share this interest with other female anglers in the future. Without regulations to conserve striped bass populations, this is not possible. Protecting striped bass stocks, safeguarding the recreational angling industry that relies on these fish, and ensuring that future generations of anglers can enjoy catching our coastal fishery are paramount. With this said, I wish to support the following options in the current Amendment 7 draft:

On 4.1 Management Triggers, I support:

Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality

Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold

Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions

Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, I support:

Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method

Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, I support:

Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. We recognize this option may require more restrictive management measures than option A, which I support

On 4.4.2 Rebuilding Plan Framework, I support:

Option B to allow the Board to take direct management actions as well as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, “Management program equivalency (also known as “conservation equivalency” or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

I believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically, I support:

Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level

Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates

Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries

Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

Thank you for providing the opportunity to comment on Amendment 7. I look forward to learning the outcome of the upcoming stock assessment and to reading the final version of the Amendment.

Adrienne O'Donnell  
4/14/2022

**From:** [Jerry Audet](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Thursday, April 14, 2022 1:13:53 PM

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To the commission

I am commenting on the proposed striped bass Amendment 7.

My name is Jerry Audet and I'm from Douglas, Massachusetts.

I'm a surfcaster and my livelihood is entirely built around the striped bass. I am the managing editor of Surfcasters Journal, and I am a freelance writer and photographer with about 90% of my income derived by writing about, shooting, and teaching (seminars) about striped bass. I make a much higher percentage of my yearly income from stripers than 99% of commercial striped bass fisherman. In fact, my reliance on stripers is similar to many charter captains and small business owners.

Here are my choices for the tiers- and yes, I'm going to make more comments after (though I know they will most likely be ignored).

## **4.1**

### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

### **Tier 3**

Option A- Support A3

Option B- Support B2

### **Tier 4**

Support A

## **4.2**

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D2

### **4.4.1**

Support B

#### 4.4.2

Support B

#### 4.6.2

Option B- Support B1-a

Option C- Support C3

Option D- Support D3

Option E- Support E3

I would like to make a few more general comments:

1. The public information document for Amendment 7 was WAY too complex, too long, with too much jargon and unnecessary details. It dissuaded public comment- there is no way to argue against this. Just go online or to a fishing club and talk with anglers. They couldn't deal with the document. I have been trying to get friends, colleagues, and my followers on social media to comment for weeks now. They won't; because they can't get through the document, and don't know what to say. If you want the public to be engaged, you HAVE to change this policy of overcomplicated, burdensome documents. **In the future, at minimum there should be some kind of summary document that is short enough for the average citizen to read in less than 10-minutes, which can be understood by everyone.**

2. **We should be managing the striped bass for abundance and not for yield- it's what's right for the fish, but also from an economic stand point.**

3. The ASMFC has adopted measures with low statistical chances of being successful over very long timelines. I have no idea why this has been the modus operandi, but it needs to change. As a former research scientist, I KNOW- not believe- that this is the wrong way to manage this fishery. **We more aggressive measures that have a higher likelihood of protecting the fishery, and rebuilding and responding more quickly.**

4. I am in total opposition to any measure that would decrease the benchmarks the fishery is managed by. **We should not be lowering or shifting baselines. We have managed the population well in the past, and should never consider decreasing our population targets** (SSB thresholds and triggers). A sliding base-line is unacceptable and will be the demise of this fishery!

5. I would be in support of fishing closures if there was scientific evidence (or, any evidence) it would make a difference. I would be in support of LONG closures (6-weeks) if it meant saving the species from overfishing. However, it seems yet another failing to suggest this regulation without any evidence it will do anything.

6. I think there should be investigation into single-hook requirements, as is required in places like the Kennebec river or in Quebec, Canada. I only fish lures with single front hooks, and it works great- hundreds and hundreds of stripers caught each season using this method.

**Above all else, I ask that the ASMFC act quickly, decisively, and with abundance- not yield- at the forefront of their striped bass management decisions. We must rebuild this fishery in less than 10-years, and at all costs, and that requires immediate and aggressive action from the commission.**

I anxiously await the decisions of the commission.

Jerry Audet

Douglas, MA

--

Jerry Audet

Freelance Writer, Editor, Photographer

[indeepoutdoorsmedia@gmail.com](mailto:indeepoutdoorsmedia@gmail.com)

[www.indeepoutdoors.com](http://www.indeepoutdoors.com)

From: [Rocco IV](#)  
To: [Comments](#)  
Subject: [External] Comment for Amendment 7  
Date: Thursday, April 14, 2022 1:10:17 PM

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My name is Rocco Risbara and I am an avid surfcaster from the state of Maine. Striped bass fishing has been a lifelong outlet for me to enjoy the outdoors close to my home. It taught me the importance of paying attention to nature and your surroundings and learning to observe what the factors of nature are trying to tell you. Right now the striped fishery is telling us it's time to act to save these fish and start managing for abundance. For their sake and the sake of my children, I hope we can finally start listening to nature and take meaningful action toward securing the future of this important fishery. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:  
Support A1  
Support B1  
Support C1

TIER 2:  
Support A2  
Support B1  
Support C1

TIER 3:  
Support A2  
Support B2

TIER 4:  
Support A

4.2  
None  
Support C1, C2  
Support D2

4.4.1  
Support B

4.4.2  
Support B

4.6.2  
Support B1-a  
Support C3  
Support D2  
Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Rocco Risbara  
Scarborough, Maine  
Email: [rrisb19@gmail.com](mailto:rrisb19@gmail.com)



Reply

Forward

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**From:** [Foster Reed](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment # 7 -  
**Date:** Thursday, April 14, 2022 12:55:52 PM

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Dear Readers-

I am writing to offer some thoughts regarding Striped Bass management. I am a lifelong fly fisher who has fished from Florida and the Caribbean to British Columbia, from Patagonia to the Russia Far East and Kola Peninsula, from Norway to Switzerland and any where else I happened to find myself. I fish mostly for trout and Steelhead and Atlantic and Pacific Salmon and Striped Bass.

Regarding some specifics before you - it is hard to fathom the concept of Conservation Equivalency in real life. I do not understand why there cannot be a global approach to striped bass conservation. A measurable decline in stock must create an immediate response. There should be a defensible scientific measurement and legal enforcement of recruitment triggers, area and seasonal closures, spawning calculations and fisheries policy. What you are facing is being faced around the world...the universe of fisheries in a long term, dire and precarious situation.

The people who can actually come up with the best approaches are the people on the water, the fishermen and the scientists. It is discouraging to imagine that the logic driving these issues is so garbled.

In all of these fisheries I see a world that is declining, that is dying before my eyes. Near Key West at a tackle store ten years or so ago I happened across a museum dedicated to Zane Grey and Ernest Hemingway, posing next to monsters that they had caught, gaffed and winched on board for the trophy shot - these big game fishermen took the DNA of their prey out of the water, so much so that fish of that size are no longer part of the survey.

I have been a long time member of Trout Unlimited, Friends of the Delaware, and a long time supporter of Wild Salmon...I have contributed to the Alewife project on the Kennebec. I think I am a typical old guy next to the water- my experience is not so different than any one else's. We all see the same thing - our fish are leaving, and humans are why.

Fishermen need to use barbless and circle hooks. They need to be taught to keep the fish in the water. Fish should not be grabbed by their lower lip then yanked into the air. When the angler takes the fish out of the water for the picture that fish is being suffocated. Fish should never be gaffed. Nets are there for a purpose... Magazines, tackle shops, guide services, state departments of fisheries, etc...should retire the trophy shot - take it with the fish in the water...go ahead - jump in with the fish !

If the purpose of conservation is to improve the health of the species then habitat is a where to start. Healthy water attracts baitfish, which brings the bass and other predator fish. Maybe a better word than 'attracts' would be 'allows'. If there is over harvesting of baitfish there is less for the bass to survive on. If the bass are over harvested then the conservationist and managers will have failed. If the water quality is too hot, or lacks oxygen, then the fish need to be left alone. what happens in the South echoes in the North. Just because a fish happens to be in a certain State today does not mean that it will still be there tomorrow - they are trying to get to the Bay of Fundy and back, or attain a variation of that journey. Our job is to allow them safe passage.

Sincerely,

Foster Reed

**From:** [Stephen Duda](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 12:47:52 PM

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We need to manage the fishery to maintain an abundant striped bass population. In my opinion, the following are the best options to maintain the fishery, while giving opportunity to fish.

#### Management Triggers

##### Tier 1: Fishing Mortality (F) Triggers

Option A- A1

Option B- B1

Option C- C1

##### Tier 2: Female Spawning Stock Biomass (SSB) Triggers

Option A- A2

Option B- B1

Option C- C1

##### Tier 3: Recruitment Trigger Definition

Option A- A3

Option B- B2

##### Tier 4: Deferred Management Action

Option A

#### Recreational Release Mortality

Option A

Option B- B2-a (Only)

Option C- C1 and C2

Option D- D1

#### Rebuilding Plan

Option B

#### Conservation Equivalency

Option B- B1-a

Option C- C3

Option D- D3

Option E- E2

As a person who has witnessed the previous collapse of the striped bass population, I hope the appropriate measures are put in place. I hope you take my opinion into consideration.

Thank You,  
Stephen Duda



**From:** [Brendan Dunphy](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 12:40:38 PM

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Good day, Its a shame striped bass stocks are still as abysmal as they currently are especially with the information and data we have at our disposal. It is imperative we do not let history repeat itself and risk losing our beloved morone saxatilis. We need to stop managing this from the perspective of how can we still take from this resource but ultimately do whats the best for morone saxatilis to thrive. With that said Amendment 7 is a start but I always feel like we can do better and should do better. At the end of the day the most important part of all of this is the health of the biomass. Granted this is a somewhat idealistic take but we must employ measures that will allow the resource to thrive once again. History will not forget how many chances you as the managing body had to address dwindling numbers the striped bass. With the constraints of the amendment I support the most strict management positions.

**Tier 1: Fishing Mortality (F) triggers Suboption A1**

**Option B: F Threshold Triggers Sub-option B1**

**Option C: F Target Trigger Sub-option C1**

**Tier 2: SSB Triggers Option A: Deadline to Implement a Rebuilding Plan Sub option A2**

**Option B: SSB Threshold Trigger, Sub-option B1**

**Option C: SSB Target Trigger Sub-option C1**

**Tier 3: Recruitment Triggers, Option A: Recruitment Trigger Definition, Sub-option A2**

**Option B: Management Response to Recruitment Trigger, Sub-option B2**

**Tier 4: Deferred Management Action, Option A**

**4.2.2 Measures to Address Recreational Release Mortality, Recreational anglers need to be held to a much higher standard that what is specifically mentioned in this bill. As a recreational angler myself i have first hand experience with individuals not adhering to proper catch and release standards. Circle hooks when fishing with live bait. Encourage inline hooks on plugs or crushed barbs at the very least. Limits plugs to 1 treble hook per plug. I support suboption C1 and C2.**

**Option D. Outreach and Education i support suboption D2**

**4.4.1 Recruitment Assumption for Rebuilding Calculation. I support option B**

**4.4.2 Rebuilding Plan Framework, I Support Option B**

**4.6.2 Management Program Equivalency; Conservation Equivalency programs need to be done with. This have proven not to work in previous years and allows states to circumvent what is best for morone saxatilis. It has limited the recovery of striped bass. It has led to states not meeting their conservation goals. It is the root cause of large year classes not contributing to the coastal stock in the volume that was expected. It is one of the leading causes of the current troubled state of striped bass. We need to do better please see that CE is not an effective management tool. I support option B**

**Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals; I Support Sub-option C3**

Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries;  
I Support Sub-option D2

Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries,  
I Support Sub-option E2

**From:** [Mark Gagliano](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment 7  
**Date:** Thursday, April 14, 2022 12:31:02 PM

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I would ban trollers from taking baitfish and smaller species ,that stripped bass feed on. I would also make sure every vessel has an observer on board, keep the bycatch to a absolute minimum. The vessel should have an extruder. Fishing for stripped bass should be closed for at least a year. The following year, it should be catch and release only. Thanks!!!

[Sent from Yahoo Mail on Android](#)

**From:** [Ed Sylvester](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [Michael Armstrong](#); [Dan Mckiernan](#); [Rep. Sarah K. Peake](#); [Raymond Kane](#); [LOWELL WHITNEY](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 12:28:52 PM

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Dear ASMFC,

I grew up fishing for striped bass on the Massachusetts coast. Stripers are a critical species to the North Atlantic environment as well as to the sporting culture of Massachusetts and they deserve protection.

I support the following positions:

4.1

Tier 1

A1

B1

C1

Tier 2

A2

B1

C1

Tier 3

A2

B2

Tier 4

A - No Deferred Management Action

4.2.2

C1

C2

D2

4.4

B

4.4.2

B

4.6.2

B1-a

C3

D2

E2

Thank you,

Ed Sylvester

**From:** [rich@upnatemmaine.com](mailto:rich@upnatemmaine.com)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 12:23:43 PM

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Good Afternoon ASMFC,

My name is Rich Pschirrer and I am owner/operator of Upnatem! Guide Service based in New Gloucester, ME. I am a board member of Maine Operation Game Thief, and a member of both ASGA and Maine Association of Charter Boat Captains. My bread and butter so to speak is offering Striper fishing trips in the Kennebec River watershed June - September. Last year was my first year guiding full time after a 20+ year career in the outdoor retail management world with Cabela's and LL Bean. In my first full season I ran 56 trips with clients from around the world coming to Maine to catch and release a fly rod Striper. Striped Bass are my business partners.

As Stripers are my business partner I feel it is my obligation to support these great fish with the same exuberance that they crush my client's fly. That said, I support the fastest, most aggressive plan to see that the Striper fishery is allowed to rebuild its stocks.

As the ASMFC considers amendment 7 I believe that the use Conservation Equivalencies must be eliminated.

- **Conservation Equivalency (CE)** has been the most misused management tool in this fishery. It allows states to enact different regulations with the goal of achieving equivalent mortality reductions or increases. There's no accountability for states using CE's: the data limitations often can't support the use of CE's; and the track record for many CE's is appalling. [Sec. 4.6] We need the following guardrails:
  - No CE's permitted when striped bass are overfished.
  - Data used in CE proposals must meet the federal standard of 30 Percent Standard Error or less.
  - We need a 25% Uncertainty Buffer (front-end margin of error) built into any CE.
  - Equivalency for CE proposals must meet the state-specific level.
- We can't afford to weaken any existing Management Triggers nor delay implementation of action as the result of a Trigger. Allowing Deferred Management Action would be a setback. [Sec. 4.1]
- We need the most conservative recruitment triggers and fastest timeline for any required rebuilding plan. [Sec. 4.1]
- Seasonal Closures, as outlined in this draft, are not a reliable way to reduce striper mortality. Any new steps must be science-based, quantifiable, and enforceable. [Sec. 4.2]
- We must use the more recent, more conservative spawning success measures in calculations known as Low Recruitment Assumption. [Sec. 4.4]

I appreciate your consideration and the opportunity to share my perspective. I implore you to consider the future of these awesome fish by placing the fish first. A healthy and vibrant fishery is a legacy that the ASMFC could and should be proud of, but without aggressive protective, science based measures we will lose this fishery.

Tight Lines and Shoot Straight,  
Rich

Capt. Rich Pschirrer  
Upnatem! Guide Service  
60 Sawyer Rd  
New Gloucester, ME 04260  
[rich@upnatemmaine.com](mailto:rich@upnatemmaine.com)  
207-232-1702

**From:** [Stephen Kazmierski](#)  
**To:** [Comments](#)  
**Subject:** [External] Comment for Amendment 7  
**Date:** Thursday, April 14, 2022 12:20:30 PM

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My name is Stephen Kazmierski and I am an avid surfcaster from the state of New York. I'm a resident of Shelter Island , NY and have been a surfcaster here on the East End for 30+ years. I do what I can to preserve the bass population. I practice catch and release, use single hooks w/crushed barbs, and haven't harvested a bass in 20 years. I support a coast-wide size/creel limit on striped bass and oppose any type of Conservation Equivalency. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Stephen Kazmierski  
Shelter Island, New York  
Email: [skazmierski4@gmail.com](mailto:skazmierski4@gmail.com)



**From:** [BlackHawk Fishing](#)  
**To:** [Comments](#)  
**Cc:** [Justin Davis](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 11:51:22 AM

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Dear ASMFC,

My name is Capt. Greg Dubrule, and I've been a full time fisherman for over 50 years. I've seen many things change over the years with regards to fish regulations. I take over 10,000 fisherman a year on our 65 foot party boat Black Hawk. Many travel great distances to fish with us. But they all have one common goal- to bring home fish fillets to eat and enjoy. Striped bass is a very popular species to us. The current "slot" limit is working out quite well. Our customers get to harvest a few bass, while returning large breeding females. Our deckhands are professional full time employees that know how to handle returnable bass quickly and efficiently. For hire boats like ours have the lowest release mortality rate on all species of fish.

Lastly, our customers like to eat fish. We break each and every day up with a combination of a variety of other species, like scup and sea bass. This takes the fishing pressure off of the striped bass. Please keep the striped bass regulations status quo. Our financial livelihood depends on it.

Respectfully,

Capt. Greg Dubrule

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Black Hawk II  
Niantic, CT  
860-448-3662  
<http://www.BlackHawkSportFishing.com>

**From:** [Mark Gagliano](#)  
**To:** [Comments](#)  
**Subject:** [External] Stripped Bass  
**Date:** Thursday, April 14, 2022 11:45:33 AM

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Please make an effort to shut down trolling for baitfish and other smaller fish that is used for fish oil supplements. Also make sure that bycatch of all game fish is held to a minimum . There should be an observer on every vessel. The vessels must have excluders to minimize bycatch.Thsnk you!

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[Sent from Yahoo Mail on Android](#)

**From:** [Eric Brown](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 11:42:07 AM

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Striped bass are an iconic gamefish and integral part of our marine ecosystem. They need to be protected for future generations. Moratorium is necessary.

**From:** [Chris Noonan](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 11:30:23 AM

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To Whom it may concern,

As an avid fly fisherman I fish for Striped Bass annually from mid April until October. I fish primarily on the Maine and New Hampshire coast but also in Massachusetts and Rhode Island. I encourage and support immediate action to rebuild the Striper fishery on the East Coast. You have enough evidence to act now. Time is of the essence.

The measures taken in the mid-1980's worked and the actions taken more recently in Canada to rebuild the Striper fishery in the Gulf of St Lawrence were very successful.

Once the fishery is restored ongoing policies must be enacted to maintain healthy numbers of Striped Bass. Only acting when a collapse is imminent and then returning to overfishing doesn't seem to work.

Please enact immediate measures to enable recovery and find policies that insure ongoing healthy populations of Striped Bass.

Sincerely,  
Chris Noonan  
Intervale NH

**From:** [Jack Flatley](#)  
**To:** [Comments](#)  
**Cc:** [James Gilmore](#); [Emerson Hasbrouck](#); [Sen. TODD KAMINSKY](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 11:29:39 AM

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Hello,

I'd like to submit my thoughts on striped bass regulation in the Atlantic states marine fishery.

Striped bass are the epitome of East Coast marine life. As a result of their steep decline and loss of spawning habitat, I would like to see a complete moratorium of striped bass harvest until population numbers are steadily increasing for quite some time. Fishing should for striped bass should continue on a catch and release basis, with a greater emphasis put on healthy release of the fish by NY DEC.

There should be no commercial harvest of striped bass in the Atlantic. The fish are more valuable in the water than they are out, if striped bass are lost to the modern world it will be one of the biggest tragedy's in American conservation and wildlife history.

Senator Kaminsky, the Flatley family is counting on you to increase regulations and tactics to promote striped bass population growth. Please do anything you can to save them.

Sincerely,  
Jack Flatley

From: [Patrick Perrotto](#)  
To: [Comments](#)  
Cc: [TOM FOTE](#); [C. LOUIS BASSANO](#); [HEATHER CORBETT](#); [Peter J. Clarke](#)  
Subject: [External] Amendment 7  
Date: Thursday, April 14, 2022 11:29:07 AM

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Dear Members of the ASMFC Atlantic Striped Bass Management Board:

I am writing in regards to Amendment 7, and thank you for allowing my comments to be considered.

Fishing for striped bass encompasses much of my free time. For about 9 months out of the year, I fish from land and boats. While I live in New Jersey, I travel to different states specifically targeting striped bass. I value this amazing resource, and as a recreational angler, I hope to be able to share it with my 3 year old son.

Unfortunately over the past few years I have noticed a steady decline in the numbers and quality of striped bass, which is why I am writing this letter. I feel that the species is a valuable resource on the east coast and some authoritative action needs to be enacted to protect the biomass. In my experience, which is admittedly anecdotal and non-scientific, localized abundance does not equate to coast wide abundance. This is why I am urging you to take swift action to rebuild the stock.

#### 4.1 Management Triggers

##### Tier 1: Fishing Mortality (F) Triggers

**-Option A:** Timeline to Reduce F to the Target: I support ***Sub-option A1 (status quo)***

**-Option B:** F Threshold Triggers: I support ***Sub-option B1 (status quo)***

**-Option C:** F Target Triggers: I support ***Sub-option C1 (status quo)***

##### Tier 2: SSB Triggers

**-Option A:** Deadline to Implement a Rebuilding Plan: I support ***Sub-option A2***

**-Option B:** SSB Threshold Trigger: I support ***Sub-option B1 (status quo)***

**-Option C:** SSB Target Trigger: I support ***Sub-option C1 (status quo)***

##### Tier 3: Recruitment Triggers

**-Option A:** Recruitment Trigger Definition: I support ***Sub-option A2***

**-Option B:** Management Response to Recruitment Trigger: I support ***Sub-option B2***

**Tier 4: Deferred Management Action:** I support **Option A (status quo)**

**4.2.2 Measures to Address Recreational Release Mortality:** I would support Sub-option B2-b if there was a way to guarantee proper enforcement

**-Option C:** I support **Sub-option C1 and Sub-option C2**

**-Option D:** Outreach and Education: I support **Sub-option D2**

**4.4.1 Recruitment Assumption for Rebuilding Calculation:** I support **Option B**

**4.4.2 Rebuilding Plan Framework:** I support **Option B**

**4.6.2 Management Program Equivalency**

***I must convey that I strongly oppose conservation equivalency. In my opinion my state, New Jersey, is a major offender of this, and I would like you to be aware that I am asking that conservation equivalency be off the table.***

**-Option B:** Restrict the use of Conservation Equivalency Based on Stock Status: I support **Sub-option B1-a**

**-Option C:** Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals: I support **Sub-option C3**

**-Option D:** Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries: I support **Sub-option D2**

**Option E:** Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries: I support **Sub-option E2**

I hope that you take my letter to heart and consider my input in as it pertains to Amendment 7. As most striper fisherman will tell you, there is something about this fish that is unexplainable. I was hooked from the time I caught my first striper as a child. I hope that my son can experience the kind of fishing that I did two decades ago. I trust that you will take this fishery in a positive direction.

Sincerely,

Patrick Perrotto

--



[Patrick Perrotto](#)

**Patrick Perrotto Production Services LLC**

908.309.8044 || [patrickperrotto@gmail.com](mailto:patrickperrotto@gmail.com) || [www.patrickperrotto.com](http://www.patrickperrotto.com)



**From:** [Tyler Sparrow](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Comment on Amendment 7  
**Date:** Thursday, April 14, 2022 11:20:33 AM

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To the Advisors and Board members of the Atlantic States Marine Fisheries Commission:

As an avid fly angler who is just now beginning to experience the joy of introducing my children to our wonderful fishery here in MA and RI, I welcome the opportunity for public commentary on the proposed Amendment 7 to the ASMFC Atlantic Striped Bass Management Plan. Striped bass are an amazing fish whose worth to the region would be drastically improved by smart, conservation-minded regulation. From my perspective, protecting our striped bass stocks, safeguarding the recreational angling industry that relies on these fish, and ensuring that future generations of anglers can enjoy catching striped bass in our coastal fishery is of the utmost importance, and we are now in a position to make lasting changes, if the correct approach is adopted. With this said, I wish to write in support of the following options in the current Amendment 7 draft:

On 4.1 Management Triggers, I support:

Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality

Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold

Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions

Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, I support:

Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method

Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, I support:

Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. I recognize this option may require more restrictive management measures than option A, which we support

On 4.4.2 Rebuilding Plan Framework, I support:

Option B to allow the Board to take direct management actions as well as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029



On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, “Management program equivalency (also known as “conservation equivalency” or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

I believe in restricting the use of conservation equivalency (CE) based on stock status. More specifically, I support:

Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level

Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates

Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries

Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

Thank you for providing the opportunity to comment on Amendment 7. I look forward to learning the outcome of the upcoming stock assessment and to reading the final version of the Amendment. And more importantly, I look forward to many more years of enjoying our incredible fishery with the help of the smart, conservation-focused regulations and standards that I sincerely hope will be adopted.

Many thanks,

Tyler Sparrow

--

**Tyler L. Sparrow**  
87 Taylor Road  
Acton, MA 01720

e. [tylerlsparrow@gmail.com](mailto:tylerlsparrow@gmail.com)

t. (401) 255-3820

**From:** [capt.mike.lightbitcharters.com](mailto:capt.mike.lightbitcharters.com)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 11:12:40 AM

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I am the owner and operator of Light Bite Charters in Norwalk Connecticut as well as the CT Board Member for the American Saltwater Guides Association. My service provides flyfishing and light tackle fishing for Striped Bass, Bluefish and False Albacore in the Western Long Island Sound. I am a firm believer in the ASGA's stance that a healthy and sustainable Striped Bass fishery is paramount not only to ensure the proliferation of the resource but also to the hundreds if not thousands of businesses and individuals who rely on this Iconic fish not only to make a living but to make lasting memories with family and friends.

Over the last 15-20 years it's not hard to see there has been a steady decline not only in population but in size of striped bass along the eastern seaboard. I fear that if appropriate management actions are not taken we may not only lose the resource completely but also the 100's of millions of dollars in revenue that businesses and States rely on.

Here is my stance on the current proposals:

#### 4.1 Management Triggers

Tier 1: Fishing Mortality (F) Triggers

##### **Option A: Timeline to Reduce F to the Target**

**ASGA Supports Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year.

##### **Option B: F Threshold Triggers**

**ASGA Supports Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

##### **Option C: F Target Triggers**

**ASGA Supports Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

Tier 2: Spawning Stock Biomass (SSB) Triggers

##### **Option A: Deadline to Implement a Rebuilding Plan**

**ASGA Supports Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

##### **Option B: SSB Threshold Trigger**

**ASGA Supports Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level

within an established timeframe [not to exceed 10-years].

### **Option C: SSB Target Trigger**

**ASGA Supports Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

Tier 3: Recruitment Triggers

### **Option A: Recruitment Trigger Definition**

**ASGA Supports Sub-option A2:** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

### **Option B: Management Response to Recruitment Trigger**

**ASGA Supports Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

Tier 4: Deferred Management Action

### **ASGA Supports Option A (status quo): No Deferred Management Action.**

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

## **4.2.2 Measures to Address Recreational Release Mortality**

### **Option C. Additional Gear Restrictions**

**ASGA Supports Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**ASGA Supports Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

### **Option D. Outreach and Education**

**ASGA Supports Sub-option D2:** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

## **4.4 Rebuilding Plan**

### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

**ASGA Supports Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment

regime assumption as identified by the change point analysis.

#### **4.4.2 Rebuilding Plan Framework**

**ASGA Supports Option B:** 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 recruitment assumption specified in Amendment 7) 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.

#### **4.6.2 Management Program Equivalency (Conservation Equivalency)**

##### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

**ASGA Supports Sub-option B1-a:** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

##### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

**ASGA Supports Sub-option C3:** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

##### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

**ASGA Supports Sub-option D2:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

##### **Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

**ASGA Supports Sub-option E2:** the percent reduction/liberalization projected for the FMP standard at the state-specific level.

I thank you in advance for your efforts and I am confident you will take the appropriate actions necessary to bring back striped bass populations to healthy and abundant levels. Get [Outlook for iOS](#)

**From:** [Ian Cissel](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Ammendment 7  
**Date:** Thursday, April 14, 2022 11:10:34 AM

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To Whom It May Concern,

I am not sure why we continue to dance around this issue. Everytime a question comes up regarding striped bass numbers we throw together a study or more research and delay, delay while more fish continue to be slaughtered. There is no doubt that the stock is in decline, no further study is required to confirm that. **A moratorium needs to be put in place on the harvest of striped bass.** Please see the necessity of this measure.

Sincerely,  
Ian Cissel

**From:** [Jacob Kostraba](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7 Comment  
**Date:** Thursday, April 14, 2022 11:06:04 AM

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Dear committee members,

Stripers are a valuable resource and need to be protected so that future generations can have access to them the same way we have. They are a huge economic resource and are also the center for countless memories made by many.

For that reason, I am asking that you support the following actions to protect this resource:

1. Tier 1, Option A2: Reduce Fishing Mortality to a level that is at or below the target within a year.
  - Option C1: If the committee cannot agree to this, I would ask that they support using the Fishing Mortality and SBB metrics as laid out in Option C.
2. Tier 2, Option A2: Install a two year deadline on implementing a Rebuilding Plan
3. Tier 3, Option B2
4. Tier 4, Option A: Enact a management plan with no deferred action
5. Sub-option C1 under 4.2.2 Measures to Address Recreational Release Mortality: prohibit the use of lethal devices to remove striped bass from the water
6. Sub-option D2 under 4.2.2 Measures to Address Recreational Release Mortality: Continue promoting best practices for handling and release of fish. States should provide updates on education and outreach efforts for monitoring purposes
7. Option B for the Rebuilding Plan Framework
8. Option B for the Management Program Equivalency

Thank you,  
Jacob Kostraba

**From:** [Tom Baudanza](#)  
**To:** [Comments](#)  
**Cc:** [Tom Baudanza](#)  
**Subject:** [External] Striped Bass PID  
**Date:** Thursday, April 14, 2022 10:42:28 AM

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Dear Ms. Franke;

Thank you for the opportunity to comment on Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass. Draft Amendment 7 (DA7) was written to address: Management Triggers; Recreational Release Mortality; Rebuilding Plan; and Conservation Equivalency.

Comments are as follows:

1. Female striped bass reach sexual maturity around age 6 which is typically at a size of 26-27 inches. The slot limit for striped bass harvest in the Hudson River (18-28 inches) and 1 fish daily limit is very restrictive and should be adequate to protect spawning stocks in the river. The harvestable slot for marine waters in NY is 28-35 inches which is significantly less restrictive while the fishing pressure is substantially greater and spawning size fish are in these coastal waters susceptible to harvest for a significantly longer period of time. Current regs for the HR are adequate for protecting spawning fish while lowering the size limit for coastal waters is warranted during the rebuilding of spawning stock biomass.
2. This HR regulation for recreational harvest previously allowed for a daily harvest of 1 fish that could also be >40 inches. The portion of the regulation has recently been removed which further protects those older, productive age classes from harvest in the Hudson River.
3. Additional regulatory changes that eliminated the use of "J" hooks were implemented last year. The intended effects on further limiting hooking mortality on spawning stocks has either not been evaluated or the data has not been released for review. This reg should substantially reduce release mortality in recreational fisheries and benefit spawning fish in the HR.
4. Of the 11 coastal states with commercial quotas, NYS has 28% of the total allocation. This appears extremely high and could be an area to reduce harvest to rebuild spawning stocks. ASMFC needs to understand these impacts before considering the closure or partial closure of the 5 week recreational fishery in the tidal HR which already has extremely protective harvest regulations.
5. Harvest and discard mortality extends beyond 0-3 miles off the coast and under jurisdiction of ASMFC. I'm not clear as to whether the commercial quotas beyond this limit factor in any estimates for unknown discard mortality from either directed or non-directed commercial fisheries. Also it is not clear as to whether or not quotas factor in harvest in Federal waters, beyond the jurisdiction of ASMFC. Monitoring, limiting and reporting of these mortality estimates are critical to rebuilding efforts.
6. Has declining water quality been considered as a potential factor in lower recruitment

estimates? How has the addition of increased suspended sediment (SS) from the Ashokan Reservoir Release affected recruitment? The principal component of SS from Ashokan Reservoir is fine glacial clay. Does this fine clay material stick to fish eggs and affect oxygen transport across the egg membrane, thereby limiting recruitment? How has declining water quality in the form of added SS affected small invertebrate populations that young-of-year striped bass rely on for food? How has this affected sight feeding of young fish? PP 71; Habitat Conservation- DEC should look at levels of SS from the Ashokan Reservoir release and analyze how this compares with levels listed as detrimental to egg viability, larval survival to evaluate effects on striped bass recruitment in the HR (pp 14-15 in Amendment 7). What SS levels is DEC permitting in the release and what are the effects of these suspended sediment concentrations from the Ashokan Reservoir releases on recruitment? From Draft Amendment 7: "Striped bass spawning runs may be blocked when the concentration of total suspended solids exceeds 350 mg/L (Radtke & Turner, 1967). Suspended sediment loads  $\geq 500$  mg/L had a significant negative effect on larval survival (Auld & Schubel, 1978)."

7. 1.3.1 Commercial fishery: recreational fishery accounts for 80% of total removals since 1985 (1.3). The commercial striped bass harvest is relatively stable and managed by a quota. However, the total commercial harvest needs to account for and include the striped bass by-catch mortality resulting from other commercial fisheries (non-directed). Not sure how closely this is monitored or accurately reported but I would assume this to be a principal factor in the decline in striped bass spawning stocks. Commercial gear is indiscriminate in the species it kills, especially considering habitat overlap with other commercial fisheries! Non-directed commercial fisheries continue to harvest and kill spawning sized stripers well past when the striper quota is met.
8. HR management triggers should also initiate regulatory changes in the ocean fishery, where the real pressure on the fishery occurs...exponentially greater angling pressure and spawning stock stripers are along the coast for a significantly greater period of time than they are in the HR (targeted exploitation rate).
9. The objective to allow states flexibility to implement alternative strategies is troubling. All coastal states need to be protective of these migratory spawning stocks through circle hook requirements and slot limits protective of spawning females (>28in). This accomplishes maintaining "coastwide consistency of implemented measures" listed in the 3<sup>rd</sup> objective. With the objective to increase spawning stock biomass, you can't protect these fish in the tributaries and allow them to be harvested along the coast where fishing pressure is greater and they're there for a significantly longer period. Why should one user group be subjected to restrictions and not others targeting the same population of fish.
10. Discard and release mortality is also likely to be higher in warmer water temperatures which occurs in coastal waters during summer months. Therefore spawning aged fish >35 inches that are required for release in coastal waters of NY are subjected to this higher mortality (additional stressor) than fish migrating up the HR in spring.



11. PP 56; the ocean recreational fishery in Chesapeake Bay has a minimum size limit of 18". All spawning age striped bass are susceptible to this harvest including the HR spawning stock that migrates south as water temps decrease.
12. Does the 9% hooking mortality estimate used to determine F and SSB indices incorporate the regs prohibiting use of J hooks for bait anglers initiated in 2021? Recreational Release Mortality in the Hudson River should be radically reduced with the 2021 regulation requiring the use of circle hooks. The effects of this regulation have not been fully evaluated. This is acknowledged on pp 2 of DA7 "the Board is sometimes criticized for considering changes to the management program before the stock has a chance to respond to the most recent management changes."

Occasionally in fish management, regulations are misplaced and don't regulate or address where the problem is occurring. This happened with the closure of the shad fishery in NY. After over a decade of closure, the fishery has not recovered and remains closed. If this closure targeted the real issue, the fishery would have recovered (unless it was beyond a return threshold). Declines in American shad spawning stocks are being attributed to fishing in Nova Scotia or off the Jersey coast (Conservationist Feb/March 2022). The closure of the HR fishery does not address the cause of stock decline and stocks continue to remain low.

Any closure of the striped bass fishery in the HR would likely elicit similar results...the SSB would not recover. Harvest restrictions in the HR are extremely restrictive and virtually protect all spawning age fish. So much is unknown regarding release/discard mortality in the ocean fishery where the most significant pressure occurs. I sincerely hope the regulatory agencies do not make the same mistake as with shad and close the striped bass fishery in the HR.

Thank you for the opportunity to provide comments on Draft Amendment 7.

Respectfully submitted by,  
Tom Baudanza  
Fisheries Biologist (Ret)

**From:** [Yudichak, David J PW](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 10:34:57 AM

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**Emilie Franke, FMP Coordinator**  
1050 N. Highland St, Suite 200 A-N  
Arlington, VA 22201

Emilie:

I am a CT based recreational fisherman that primarily fishes from shore for Striped Bass. I am extremely concerned about the state of the fishery and the management of it.

I started fishing in the 80's just after the moratorium and remember well how poor the striped bass fishing was. But it was turned around and the fishery really did become quite good in the 90's and early 2000's.

Unfortunately, management practices have let this fishery dwindle once again to the point where there is a very clear problem and all of us can see it and feel it without having the scientific numbers in front of us.

But the science and statistical models have been telling us all for some time that the stocks need to be rebuilt and that can only be done with stringent change to the management of the biomass.

I support the following Tier 1 options. A: option A-1. B: Option B-1 C: Option C-1.

For Tier 2: A: Option A-2, B: Option B-1, and C: Option C-1

In Tier 3: Option A I like option A-2 and for B: Option B-2

And finally for Tier 4 I support the following: Option B, B-1a. Option C: sub-option C-3. Option D: D-2, and Option E: E-2.

I appreciate you letting me offer my views on this matter. I believe these are the best options to provide a "fast" solution to replenishing the stocks.

**Dave Yudichak**

12 Blueberry Hill Rd.

Tolland, CT 06084

**From:** [Ray](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7.  
**Date:** Thursday, April 14, 2022 10:23:54 AM

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To Whom it may concern:

My name is Ray Jarvis, I'm a fishing guide in Massachusetts and a life long angler. I have worked for the Mass DMF and UMASS SMAST and have year of experience in and around the fisheries science world. Above much else, I have seen how money is allocated toward certain recourses and how money is squandered on many "research projects".

Though many complex projects and ideas have come and gone, one thing has always made an impression on me. Funding sources and political motivations seem to be a driving force in the decisions that are made.

As a child, Striped Bass we're hard to find, but then we saw the recourse come back as management made strides to protect the recourse. This was incredible to see, but as the stock rebounded, fishing for Striped Bass again gained popularity. I think we all understand at this point that as a recreational fishery, the Striped Bass is extremely valuable. As a commercial fishery, the striped bass is valuable at the point of sale.

I understand that recreational fishing puts a huge amount of pressure on this species, but what I do not understand is why states and management as a whole have continued to allow removal of the striped bass. Harvesting these fish, whether for recreational angler consumption or through commercial sale, does not make sense in the grand scheme of things.

Mortality rate for catch and release is definitely a problem, but awareness regarding proper fish handling has reached far and wide.

Allowing commercial fisheries for striped bass and recreational harvest, have no place in today's world. Our recourse has been depleted time and again only leading to inevitable issues with the stock.

Surely there are many factors that have lead to the drop in stock assessment, but by taking the obvious steps to end removal and designate the striped bass as a game fish is a no brained. From tackle shops, to fishing guides, hotels, restaurants, gas stations, marinas, boat dealers, the list goes on of those who financially benefit by having a robust striped bass fishery.

Please takes this simple step toward rebuilding the future for this fish. It's time to end unnecessary killing of a fish that has so much more value.

Thanks for your time,

Capt. Ray Jarvis  
Salt of the Earth Sportfishing Inc.

Sent from my iPhone

**From:** [Shane Yellin](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 10:20:46 AM

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To the ASMFC Board,

It is with great concern for the future of our striped bass fishery and my livelihood that I write you in support of all possible conservation triggers and full accountability to following the scientific triggers that have been tripped. As the senior fishing product designer at a major company with a plethora of customers in the atlantic states and an uncle with a great desire to show his nephew all the amazing things our striper fishery once offered, it is critical to both my income and way of life that we preserve what we have left and do all we can to enable it to be rebuilt to the robust fishery it was in the 90s and 2000s.

While I have no ill will for commercial fisherman who make an honest living, we must act or they will permanently be out of the fishery. I find it offensive that they can fail to meet their quotas and have them roll over to the next year or that it would not trigger immediate action by the board as has been discussed/happened in the past. We must move past this mentality as it is a non starter in saving our fishery.

Please note my support for the following in amendment 7:

**4.1 Management Triggers**

*Tier 1-Fishing Mortality Management Triggers*

Option A1

Option B1

Option C1

*Tier 2-Female SSB Management Triggers*

Option A2

Option B1

Option C1

*Tier 3-Recruitment Triggers*

Option A3

Option B2

*Tier 4-Deferred Management Action*

Option A

**4.2.2 Recreational Release Mortality**

Option A

Option C1

Option C2

Option D1

**4.4.1 Rebuilding Plan**

Option B

**4.4.2 Rebuilding Plan Framework**

Option B

**4.6.2 Management Program Equivalency**

Sub-Option B1a  
Sub-Option B1c  
Sub-Option B2b  
Sub-Option C3  
Sub-Option D3  
Sub-Option E2

Regards,  
Shane Yellin  
617-256-4728

**From:** [Breanne Dowdie](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7 Comment  
**Date:** Thursday, April 14, 2022 10:19:01 AM

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Dear Committee Members,

I am writing to ask you to take a look to make a final decision on Amendment 7. Striped Bass are one of our nation's greatest resources due to their accessibility to everyone. They are the only fish we have on the east coast that can be caught in the deep waters off the coast, in the flats, tributaries, and deltas of the coast, as well as in the freshwater pools of our major rivers. This is a fish that our kids, grandkids, and great grandkids should have the opportunity to chase and catch. It's a fish that is not only at the center of many personal memories but also an economic center for so many people.

For that reason, I am asking that you support the following actions to protect this resource:

1. Tier 1, Option A2: Reduce Fishing Mortality to a level that is at or below the target within a year.
  - o Option C1: If the committee cannot agree to this, I would ask that they support using the Fishing Mortality and SBB metrics as laid out in Option C.
2. Tier 2, Option A2: Install a two year deadline on implementing a Rebuilding Plan
3. Tier 3, Option B2
4. Tier 4, Option A: Enact a management plan with no deferred action
5. Sub-option C1 under 4.2.2 Measures to Address Recreational Release Mortality: prohibit the use of lethal devices to remove striped bass from the water
6. Sub-option D2 under 4.2.2 Measures to Address Recreational Release Mortality: Continue promoting best practices for handling and release of fish. States should provide updates on education and outreach efforts for monitoring purposes
7. Option B for the Rebuilding Plan Framework
8. Option B for the Management Program Equivalency

Thank you for your time.  
Breanne Kostraba

--

Breanne Kostraba, M.S.  
*Learning & Development Lead*

3 Burlington Woods Drive

Suite 301

Burlington, MA 01803-4532

(P) 603-836-4746

[breanne.dowdie@joingroups.com](mailto:breanne.dowdie@joingroups.com)  
[www.joingroups.com](http://www.joingroups.com)

**From:** [B](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7 Comment  
**Date:** Thursday, April 14, 2022 10:13:36 AM

---

Dear Committee Members,

I am writing to ask you to take a look to make a final decision on Amendment 7. Striped Bass are one of our nation's greatest resources due to their accessibility to everyone. They are the only fish we have on the east coast that can be caught in the deep waters off the coast, in the flats, tributaries, and deltas of the coast, as well as in the freshwater pools of our major rivers. This is a fish that our kids, grandkids, and great grandkids should have the opportunity to chase and catch. Its a fish that is not only at the center of many personal memories but also an economic center for so many people.

For that reason, I am asking that you support the following actions to protect this resource:

1. Tier 1, Option A2: Reduce Fishing Mortality to a level that is at or below the target within a year.
  - Option C1: If the committee cannot agree to this, I would ask that they support using the Fishing Mortality and SBB metrics as laid out in Option C.
2. Tier 2, Option A2: Install a two year deadline on implementing a Rebuilding Plan
3. Tier 3, Option B2
4. Tier 4, Option A: Enact a management plan with no deferred action
5. Sub-option C1 under 4.2.2 Measures to Address Recreational Release Mortality: prohibit the use of lethal devices to remove striped bass from the water
6. Sub-option D2 under 4.2.2 Measures to Address Recreational Release Mortality: Continue promoting best practices for handling and release of fish. States should provide updates on education and outreach efforts for monitoring purposes
7. Option B for the Rebuilding Plan Framework
8. Option B for the Management Program Equivalency

Thank you for your time.

Tight lines,  
Britt Kostraba

**From:** [Ralph Girard](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment 7  
**Date:** Thursday, April 14, 2022 10:09:01 AM

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## Management Triggers

### Tier 1: Fishing Mortality (F) Triggers

Option A- A1

Option B- B1

Option C- C1

### Tier 2: Female Spawning Stock Biomass (SSB) Triggers

Option A- A2

Option B- B1

Option C- C1

### Tier 3: Recruitment Trigger Definition

Option A- A3

Option B- B2

### Tier 4: Deferred Management Action

Option A

## Recreational Release Mortality

Option A

Option B- B2-a (Only)

Option C- C1 and C2

Option D- D1

## Rebuilding Plan

Option B

## Conservation Equivalency

Option B- B1-a

Option C- C3

Option D- D3

Option E- E2

Sent from my iPhone



**From:** [capecodah@gmail.com](mailto:capecodah@gmail.com)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 Comments  
**Date:** Thursday, April 14, 2022 10:07:40 AM

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To the ASMFC

My name is Thomas Heath from the State of Massachusetts and I am responding to the request for public comments on Amendment Seven (7) for the management of striped bass.

Here are my best choices for each proposed regulation.

4.1  
Tier 1  
A1  
B1  
C1  
Tier 2  
A2  
B1  
C1  
Tier 3  
A2  
B2  
Tier 4  
A  
4.2  
B- None  
C1, C2  
D2  
4.4.1  
B  
4.4.2  
B  
4.6.2  
B1-a  
C3  
D2  
E2

I would like to further add that I think education and stronger enforcement of the regulations with recreational anglers needs to take place. And if the Striped Bass stocks do not rebound then I would support Catch and Release only for Stripers.

Thank you,  
Thomas Heath  
3 Bowler Rd.  
Wareham, MA 02571

[capecodah@gmail.com](mailto:capecodah@gmail.com)

**From:** [Lucas St.Clair](#)  
**To:** [Comments](#); [Sen. Dave Miramant](#); [Patrick Keliher](#); [Megan Ware](#); [AY.MCCREIGHT@legislature.maine.gov](mailto:AY.MCCREIGHT@legislature.maine.gov); [Stephen Train](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 10:06:42 AM

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Hello,

I am writing today to let you know how much striped bass mean to me and my family. We live in Falmouth Maine and fish for bass all summer. It is how I got my kids into fishing and the support of the species is paramount. Please do what you can to protect this iconic species and a way of life here on the coast of Maine.

All my best,

Lucas

**From:** [Emilie Franke](#)  
**To:** [Comments](#)  
**Subject:** FW: [External] Striped bass management  
**Date:** Thursday, April 14, 2022 10:02:46 AM

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**From:** Brian Kendall [mailto:ebrkrules@yahoo.com]  
**Sent:** Thursday, April 14, 2022 9:58 AM  
**To:** Emilie Franke <EFranke@asmfc.org>  
**Subject:** [External] Striped bass management

Hi Emilie, I am an avid recreational angler in Connecticut. I am writing in regard to the proposed striped bass management changes.

Here are my preferred options:

#### 4.1 Management Triggers:

Tier 1: A1, B1, C1  
Tier 2: A2, B1, C1  
Tier 3: A3, B2  
Tier 4: A

#### 4.2.2 Release Mortality

A  
B1: NO  
B2: NO  
C1, C2, D1

#### 4.4.1 Rebuilding

B

#### 4.4.2 Rebuilding Plan Framework

B

#### 4.6.2 Equivalency

B1a  
B1c  
B2b  
C3  
D3  
E2

Overall I support measures that err on the side of conservation and would prefer a total moratorium on killing these fish but that is not one of the options for Amendment 7.

Perhaps the Commission could move in a direction that is focused more on conservation and less on the economic benefit of the few that profit from the killing of these fish.

Thanks.

Brian Kendall  
41 Lynch Rd  
Lebanon, CT 06249  
860 319 7129

**From:** [Thomas Falco](#)  
**To:** [Comments](#); [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [Maureen Davidson](#); [Emerson Hasbrouck](#); [Sen. TODD KAMINSKY](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 9:56:23 AM

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Captain Tom Falco  
Jenny E Charters  
6 Howard Court  
Sayville, NY 11782

April 14, 2022

Dear ASMFC Commissioners,

My name is Capt. Tom Falco, owner/operator of Jenny E Charters. I primarily fish the near shore waters of the south shore of Long Island, NY out of Fire Island Inlet. To say I'm very concerned about the Striped Bass fishery would be an understatement, as I see the future of this iconic fishery in serious danger. I want to do my part to preserve this species for future generations (and for myself!), and write to you today regarding Amendment 7.

It has taken me quite some time to go thru this document and to understand all the complexities therein; for what it's worth, here is what I'd like to see:

## **4.1 Management Triggers**

### **Tier 1: Fishing Mortality (F) Triggers**

- Option A: **I support Sub-Option A1** (status quo)
- Option B: **I support Sub-Option B1** (status quo)
- Option C: **I support Sub-Option C1** (status quo)

### **Tier 2: Spawning Stock Biomass Triggers**

- Option A: **I support Sub-Option A2** (two year deadline)
- Option B: **I support Sub-Option B1** (status quo)
- Option C: **I support Sub-Option C1** (adjustments to program if SSB falls below target for 2 consecutive yrs and if fishing mortality rate exceeds the target)

### **Tier 3: Recruitment Triggers**

- Option A: **I support Sub-Option A2** (trigger is tripped when any of the four JAI's shows an index value below 75% of all values in the JAI from 1992-2006.)
- Option B: **I support Sub-Option B2** (If tripped, an interim F target is calculated/implemented using low recruitment assumption; adjustments made to reduce F

to the interim F within one yr.)

#### **Tier 4: Degree Management Plan**

Option A: **I support Option A** (status quo)

### **4.2.2 Measures to address Recreational Release Mortality**

#### **Option C: Additional Gear Restrictions:**

Option C: **I support Sub-Option C1** (Prohibit lethal device to remove bass from the water)

Option D: **I support Sub-Option D2** (promote best practices for striped bass handling)

### **4.4 Rebuilding Plan**

Option B: **I support Option B** (rebuild SSB to target no later than 2029)

#### **4.4.2 Rebuilding Plan Framework**

Option B: **I support Option B** (adjust measures if stock assessments indicate a less than 50% probability of rebuilding by 2029)

### **4.6.2 Management Program Equivalency**

#### **Option B: Restrict Use of Conservation Equivalency (CE) Based on Stock Status**

Option B: **I support Sub-Option B1-a** (No CE programs when stock is overfished or when overfishing is occurring)

#### **Option C: Precision Standards for MRIP Estimates Used in CE Proposals**

Option C: **I support Sub-Option C3** (CE proposals cannot use MRIP estimates with a PSE more than 30%)

#### **Option D: CE Uncertainty Buffer for Non-Quota Managed Fisheries**

Option D: **I support Sub-Option D2** (include an uncertainty buffer of 25%)

#### **Option E: Definition of Equivalency for CE Proposals with Non-Quota Managed**

## **Fisheries**

Option E: **I support Sub-Option E2** (Proposed CE programs required to show equivalency to the percent reduction projected for the FMP standard at the state level)

Thank you for your hard work on this very important issue. I look forward to a healthy fishery, one that we all can enjoy for generations to come.

Kind regards,

Capt. Tom Falco



**From:** [RAY RAMOS](#)  
**To:** [Comments](#)  
**Cc:** [WILLIAM HYATT](#); [ROBERT LAFRANCE](#); [Justin Davis](#); [Rep. Melissa Ziobron](#); [Sen. Craig A. Miner](#)  
**Subject:** [External] Amendment 7 Comments  
**Date:** Thursday, April 14, 2022 9:46:13 AM

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To Ms. Franke & Atlantic Stiped Bass Management Board:

Please accept this note as my concern for our beloved striped bass. I am native to the state of CT and have fished the Long Island coastline my entire life. Having grown up in an inner city, about 45 minutes away from the nearest coastline, striped bass and other fish species found along the coast provided me an “escape” from the craziness that existed around my local community. Coming home with a catch of a legal striped bass after a great day of recreational fishing not only fed our family, but provided memories of good times had with my father, uncle, who introduced me to fishing, to friends & family.

As I became an adult, I started to understand the impact that we all have to our local marine fishery, from overfishing & pollution, to bad management and politics. Now much older, a father and an avid fly angler, I recognize, more than ever, that we have to protect it and care for it to the best of our ability. Having fly fished for striped bass over 25 years I have noticed the annual decline in size and catch. It saddens me. WE ARE ALL RESPONSIBLE. It impacted and meant so much to me that I even went on to choose a career to protect them. I became a State Environmental Conservation Officer (now retired) an educator, and now a new fly-fishing guide. Anything & everything I can do to immerse and protect our local fisheries, but today, more importantly, the striped bass.

For this reason, and in speaking to friends and co-workers, I support the following options:

#### **4.1**

##### **Tier 1 Fishing Mort Triggers**

Option A- Support A1 They have been in decline for a long time

Option B- Support B1 same rationale

Option C- Support C1 Status quo

##### **Tier 2 SSB Triggers**

Option A- Support A2 Rebuilding is important

Option B- Support B1 Let’s get a timeframe in place.

Option C- Support C1 Even if we have closed seasons

### **Tier 3 recruitment Trigger Definition**

Option A- Support A2

Option B- Support B2

### **Tier 4 Deferred Management Action**

Support A – let's get this done.

#### **4.2.2 Measures to Address Recreational Release Mortality**

Option B- **B2-b** Spawning striped bass should not be harvested, especially when numbers are compromised.

Option C- Support C2

Option D- Support D2

#### **4.4 Rebuilding Plan**

##### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

Support B - let's do what we can to increase numbers.

##### **4.4.2**

Support B

##### **4.6.2**

Option B- Support B1-a

Option C- Support C3

Option D- Support D3

Option E- Support E2

Thank you for your time on this matter.

Sincerely,

Raul "Ray" Ramos

**From:** [Michael Kapareiko](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 9:35:21 AM

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Dear Ms. Franke,

I am writing you to provide public comment on Draft Amendment 7.

As a son of a marine biologist mother and avid striped bass angling father, striped bass have been ever present throughout my life. My pursuit of striped bass has taught me many valuable life lessons, kept me out of significant trouble during my teenage years, led to memorable vacations and has brought me countless moments of joy.

I grew up on the New England coast and was directly impacted by the last moratorium. As a kid, one of my earliest and most memorable catches was a 36-inch striped bass that had to be carefully released due to the moratorium. It could be said that those early striped bass experiences instilled the practice of catch and release into my blood.

Sadly, I have watched the population decline significantly over the last 5 years and have seen many of the same indicators that were reportedly present leading up to the last population crash. This has led me to voluntarily stop targeting striped bass for the last two years to avoid any potential C&R mortality.

I am writing you now because I believe the future of the atlantic striped bass population is in grave danger and because the benefits of striped bass conservation far outweighs the benefit of recreational and commercial harvest. It is important that the striped bass population be restored and managed for abundance so that future generations can benefit from the joy, education and experience that the striped bass brought to my life.

Generally speaking, I would like to see more proactive management and less delay. The use of conservation equivalency to exploit existing size and bag limits by pro-harvest States is appalling and should no be accepted. My preferred options for each Section/Options being evaluated under Amendment 7 is provided below:

#### **Section 4.1 Management Triggers**

##### **Tier 1-Fishing Mortality Triggers**

Option A1  
Option B1  
Option C1

##### **Tier 2-Female SSB Triggers**

Option A2  
Option B1  
Option C1

##### **Tier 3-Recruitment Triggers**

Option A3  
Option B2

##### **Tier 4-Deferred Management Action**

Option A

#### **Section 4.2.2 Measures to Address Recreational Release Mortality**

There should be seasonal closures or all pre-spawn staging areas and spawning grounds. Far too many bass are being harvested, landed and improperly handled in areas such as Raritan Bay and the Delaware

River. Targeting of bass that are staging to breed or actively engaged in breeding is both unethical and impacts the resulting YOY success rate.

Of the available options, I prefer implementation of the following:

Option B2-a and B2-b

Option C1

Option C2

Option D1

If I had to chose only 1 option, it would be B2-a.

#### **Section 4.4.1 Rebuilding Plan**

Option B

#### **Section 4.4.2 Rebuilding Plan Framework**

Option B

#### **Section 4.6.2 Management Program Equivalency**

Sub-Option B1a

Sub-Option B1b

Sub-Option B1c

There should be no CE if the population is in trouble.

Sub-Option B2- All stake holders should be impacted by restrictions to CE so B2-a, B2-b and B2-c

Sub-Option C2

Sub-Option D3

Sub-Option E1

Thank you for your time and consideration.

Sincerely,

Michael Kapareiko

**From:** [Ian Pullman](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 9:32:51 AM

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We need to manage the fishery to maintain an abundant striped bass population.

#### Management Triggers

##### Tier 1: Fishing Mortality (F) Triggers

Option A- A1

Option B- B1

Option C- C1

##### Tier 2: Female Spawning Stock Biomass (SSB) Triggers

Option A- A2

Option B- B1

Option C- C1

##### Tier 3: Recruitment Trigger Definition

Option A- A3

Option B- B2

##### Tier 4: Deferred Management Action

Option A

#### Recreational Release Mortality

Option A

Option B- B2-a (Only)

Option C- C1 and C2

Option D- D1

#### Rebuilding Plan

Option B

#### Conservation Equivalency

Option B- B1-a

Option C- C3

Option D- D3

Option E- E2

**From:** [Tyler McPherson](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Draft Amendment 7 Comment  
**Date:** Thursday, April 14, 2022 9:29:50 AM

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

Dear Ms. Franke and members of the ASMFC Striped Bass Advisory Council,  
Striped Bass are a very important species to me and to the local economy as well. Our region has seen a major decline in size and diversity of year classes. My desire as a constituent is that the species will be managed for abundance in the years ahead, for our generation and future generations.

**I believe that the ASMFC needs to do everything within it's power to halt both the recreational & commercial harvest of striped bass to allow the biomass to rebuild. The biomass has clearly declined over the last 10 or so years and management efforts by ASMFC have not been productive in rebuilding the biomass.**

Please find my comment on the Striped Bass Draft Amendment 7 below.

**4.1 Management Triggers**

Tier 1

- Sub-Option A1
- Sub-Option B1
- Sub-Option C1

Tier 2

- Sub-Option A2
- Sub-Option B1
- Sub-Option C1

Tier 3

- Sub-Option A2
- Sub-Option B2

Tier 4

-Option A

**4.2.2 Measures to Address Recreational Release Mortality**

Option C

- Sub-Option C1
- Sub Option C2

Option D

- Sub Option D2

**4.4 Rebuilding Plan**

**4.4.1 Recruitment Assumption for Rebuilding Calculation**

Option B

**4.4.2 Rebuilding Plan Framework**

Option B

**4.6.2 Management Program Equivalency**

Option B

- Sub-Option B1-a

Option C

- Sub-Option C3

Option D

- Sub-Option D2

Option E

- Sub-Option E2

Tyler McPherson

(781) 264-6641

[TJM@TightLineCo.com](mailto:TJM@TightLineCo.com)



From: [Christian Peters](#)  
To: [Comments](#)  
Subject: [External] Draft Amendment 7  
Date: Thursday, April 14, 2022 9:29:13 AM

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**Hello My name is Christian Sky Peters I am a striped bass fisherman/ surfcaster in Suffolk county I spend 4-5 days a week fishing during striper season and have been doing so for the last 8 years. During this time I have spent hundreds of hours and over \$10,000 on equipment and trips throughout the Tristate area (mostly to small businesses) to pursuit these fish in great strategic depth and understanding. I am first and foremost in favor of a complete moratorium on the striped bass population but this option is obviously not on the table. So I will comment on the available options below. The overall health of the species is in decline and previous methods of preservation will soon be more difficult, due to disease and overfishing. It would be most logical start transitioning to making striped bass a protected sport fish , please consider this in the future as these efforts are in the right direction but largely insufficient to the reality of the situation. The striped bass fishery is still in great peril. I hope these comments are bridging the gap that exist between the decision making body of the AMFC and the Citizens that operate the waters. Thanks for accepting these comments. I support the following options.**

#### **4.1 Management Triggers**

##### **Tier 1: Fishing Mortality (F) Triggers**

###### **Option A: Timeline to Reduce F to the Target**

**I Support Sub-option A1 (status quo): Reduce F to a level that is at or below the target within one year.**

###### **Option B: F Threshold Triggers**

**I Support Sub-option B1 (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.**

###### **Option C: F Target Triggers**

**I Supports Sub-option C1 (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.**

##### **Tier 2: Spawning Stock Biomass (SSB) Triggers**

###### **Option A: Deadline to Implement a Rebuilding Plan**

**I Support Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.**

###### **Option B: SSB Threshold Trigger**

**I Support Sub-option B1 (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].**

###### **Option C: SSB Target Trigger**

**I Support Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to**



a level that is at or above the target within an established timeframe [not to exceed 10-years].

### **Tier 3: Recruitment Triggers**

#### **Option A: Recruitment Trigger Definition**

**I Support Sub-option A2:** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA) shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

#### **Option B: Management Response to Recruitment Trigger**

**I Support Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

### **Tier 4: Deferred Management Action**

#### **I Support Option A (status quo): No Deferred Management Action.**

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

#### **4.2.2 Measures to Address Recreational Release Mortality**

##### **Option C. Additional Gear Restrictions**

**I Support Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**I Support Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

##### **Option D. Outreach and Education**

**I Support Sub-option D2:** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

### **4.4 Rebuilding Plan**

#### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

**I Support Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

#### **4.4.2 Rebuilding Plan Framework**

**I Support Option B:** 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 recruitment assumption specified in Amendment 7) 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.

#### **4.6.2 Management Program Equivalency (Conservation Equivalency)**

##### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

**I Support Sub-option B1-a:** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

##### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency**

**Proposals**

**I Support Sub-option C3: CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.**

**Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

**I Support Sub-option D2: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.**

**Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

**I Support Sub-option E2: the percent reduction/liberalization projected for the FMP standard at the state-specific level.**

**Thank you for the time**

**-Christian Sky Peters  
High HILL Striper Club**

**From:** [Ronald Landis](#)  
**To:** [Comments](#)  
**Cc:** [Stephen Train](#); [Sen. Dave Miramant](#); [Megan Ware](#); [Rep. JAY MCCREIGHT](#); [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 9:09:01 AM

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The time for action is now. Research concludes that spawning stock biomass is at a 25-year low and that the three most recent young-of-year indices in upper Chesapeake Bay are among the lowest on record. The striped bass population has suffered long enough due to commercial fisheries profiting off of our natural resources while degrading our natural environment. I support the stances that the American Saltwater Guides Association have taken on the four options included in the draft amendment, which are:

#### 4.1 Management Triggers

Tier 1: Fishing Mortality (F) Triggers

##### **Option A: Timeline to Reduce F to the Target**

**ASGA Supports Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year.

##### **Option B: F Threshold Triggers**

**ASGA Supports Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

##### **Option C: F Target Triggers**

**ASGA Supports Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

Tier 2: Spawning Stock Biomass (SSB) Triggers

##### **Option A: Deadline to Implement a Rebuilding Plan**

**ASGA Supports Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

##### **Option B: SSB Threshold Trigger**

**ASGA Supports Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

##### **Option C: SSB Target Trigger**

**ASGA Supports Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of

those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

Tier 3: Recruitment Triggers

#### **Option A: Recruitment Trigger Definition**

**ASGA Supports Sub-option A2:** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

#### **Option B: Management Response to Recruitment Trigger**

**ASGA Supports Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

Tier 4: Deferred Management Action

#### **ASGA Supports Option A (status quo): No Deferred Management Action.**

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

### **4.2.2 Measures to Address Recreational Release Mortality**

#### **Option C. Additional Gear Restrictions**

**ASGA Supports Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**ASGA Supports Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

#### **Option D. Outreach and Education**

**ASGA Supports Sub-option D2:** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

## **4.4 Rebuilding Plan**

### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

**ASGA Supports Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

### **4.4.2 Rebuilding Plan Framework**

**ASGA Supports Option B:** 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 recruitment assumption specified in Amendment 7) 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.

### **4.6.2 Management Program Equivalency (Conservation Equivalency)**

#### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

**ASGA Supports Sub-option B1-a:** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

#### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

**ASGA Supports Sub-option C3:** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

#### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

**ASGA Supports Sub-option D2:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

#### **Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

**ASGA Supports Sub-option E2:** the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Action must be taken now before it's too late.

Ronald Landis

**From:** [Chris chris](#)  
**To:** [Comments](#)  
**Cc:** [Stripercomments@gmail.com](mailto:Stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 8:59:27 AM

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Good morning,

I am a recreational angler and follower of the American Saltwater Guides Association. The ASGA has educated me on the referenced Amendment 7.

I believe the conservation of the Striped Bass as an active game fish are my desires for this Amendment, as long as we can continue to fish for them following a conservative methodology. Increasing the minimum keeper size is a good start in my option.

Thank you for allowing me to comment on this subject and hope your group adopts a means that allows the stripper population to be healthy and stable, and anglers to fish conservatively.

Respectfully,  
Christopher M. Wolf

**From:** [Hans Benford](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 8:59:15 AM

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We need to manage the fishery NOW to maintain an abundant striped bass population.

We can do that by at least doing the following:

Management Triggers

Tier 1: Fishing Mortality (F) Triggers

Option A- A1

Option B- B1

Option C- C1

Tier 2: Female Spawning Stock Biomass (SSB) Triggers

Option A- A2

Option B- B1

Option C- C1

Tier 3: Recruitment Trigger Definition

Option A- A3

Option B- B2

Tier 4: Deferred Management Action

Option A

Recreational Release Mortality

Option A

Option B- B2-a (Only)

Option C- C1 and C2

Option D- D1

Rebuilding Plan

Option B

Conservation Equivalency

Option B- B1-a

Option C- C3

Option D- D3

Option E- E2

**From:** [Joseph M. Nicosia](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 8:54:24 AM

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Please Draft Amendment &, I have been fishing for 40 years and love fishing up and down the coast for striped bass. I spend more money pursuing ,planning and gear to make vacation trips that's more important to the economy than someone keeping a fish or the head boats keeping 100 fish for all their passengers. That's not cool . I travel from Maine to the Chesapeake. The striped bass to me is the Tarpon for Florida. Tarpon was protected as Florida realized the importance of that fishery that brings in so many out of state fisherman in pursuit. I never once kept 1 fish and always take care to release.

Thank you



**Joseph M. Nicosia**

Specialist, Sols Del  
Systems Support - Post SIs SE

**Canon Solutions America, Inc.**

8000 Midlantic Drive,Suite 110N,Mt Laurel,NJ 08054

[www.csa.canon.com](http://www.csa.canon.com)

[jnicosia@csa.canon.com](mailto:jnicosia@csa.canon.com)

**C** 609.346.2969





**From:** [Joseph Drake](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 8:52:20 AM

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Thank you for your time and consideration of my input for the upcoming changes to the striped bass fisheries management plan. I would appreciate the committee/board consider to further protect the limited resource of striped bass on the eastern seaboard by reducing commercial fisheries of the striped bass. In addition, any resources they can use to influence the reduction of commercial fisheries into the basses preferred prey such as menhaden is vitally important to allow remaining striped bass schools to have plenty of forage. As well, considering resources for collaborative efforts with state and federal agencies to help manage poaching and to increase awareness of less lethal methods of catch and release fishing would be greatly appreciated. As a scientist and fisherman who has stakes in both Virginia and Massachusetts fisheries, this is an important topic that must not be ignored.

Thank you,

Joe Drake

--

Joseph Drake, PhD

Department of Biological Sciences  
926 West Campus Drive  
Blacksburg, VA 24061  
812-340-4679

**From:** [Makenzie Larson](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7:  
**Date:** Thursday, April 14, 2022 8:43:04 AM

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To whom may receive this,

I am writing to you to support certain sections of the amendment 7 striped bass fisheries management plan. I have enjoyed fishing the Long Island Sound throughout my childhood and into adulthood but have seen the degradation of the striped bass population first hand. Striped bass are one of Connecticut's longest lasting traditions for sportsmen to chase after in the spring and late summer runs. With limited opportunity to pursue game and fish in this area it would be extremely detrimental to growing the next generation of fisherman in this state and greater New England.

I support these sections of amendment 7:

#### 4.1 - Management Triggers

##### Tier 1 Options - Fishing Mortality Triggers

Priorities for Inclusion:

- Sub Option A1
- Sub Options B1
- Sub Option C1

##### Tier 2 Options - Female Spawning Stock Biomass (SSB) Management Triggers

Priorities for Inclusion:

- Sub Option A2
- Sub Option B1
- Sub Option C2

##### Tier 3 Options - Recruitment Triggers

Priorities for Inclusion:

- Sub Option A2
- Sub Option B2

##### Tier 4 Options - Deferred Management Options

Priorities for Inclusion

- Option A

#### 4.2.2 Measures to Address Recreational Release Mortality

Priorities for Inclusion:

- Sub Option C1
- Sub Option C2
- Sub Option D2

#### 4.4 Rebuilding Plan

##### 4.4.1 Recruitment Assumption for Rebuilding Calculation

Priorities for Inclusion:

- Option B

##### 4.4.2 Rebuilding Plan Framework

Priorities for Inclusion:

- Option B

#### 4.6.2 Management Program Equivalency

Priorities for Inclusion:

- Sub Option B1-a
- Sub Option C3
- Sub Option D2
- Sub Option E2

Thank you for taking the time to read my email as well as, hopefully, many others. I think the public's opinion cannot be understated in the topic of conservation because the body of sportsmen and anglers as a whole spend an incredible amount of time in the field and water every year and know every inch of the territories we love to hunt and fish.

Thank you, Makenzie Larson

**From:** [Jesse Kirk](#)  
**To:** [Comments](#)  
**Subject:** [External] ASMFC's Draft Amendment 7  
**Date:** Thursday, April 14, 2022 8:31:13 AM

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1. PUT THE STRIPED BASS FIRST.
2. MANAGE FOR MAXIMUM ABUNDANCE & NOT MAXIMUM HARVEST.
3. STOP THE REMOVAL OF BREEDING FISH FROM THE POPULATION.
4. GET OMEGA PROTEIN OUT OF MY CHESAPEAKE BAY.
5. STOP DEMONIZING CATCH & RELEASE FISHING.

Thank you for your consideration.

Recreational Fisherman

Jesse Kirk

Buyer of MD fishing licenses, MD gasoline for my boat, guided fishing trips by MD guides,  
local MD based rods/reels/lures manufacturers, maryland food

--

Sincerely,

Jesse Kirk

703-999-9120

**From:** [David Ouch](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 Public Comment Letter  
**Date:** Thursday, April 14, 2022 8:05:52 AM

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Hello,

Angler from MA here. Commenting on what I support on Amendment 7 for the Striped bass. Fishing is a big part of my life. Seeing the decline of the striped bass has concerned me for the future of this Species. We must rebuild this fishery to its former glory. Although I did not pursue Striped bass in the hay days of a great population. I want to be able to continue pursuing this fish alongside my son. Perhaps even with my grandson in the possible future. I hold this fishery close to me and respect it. Please see below the options I support.

#### 4.1

##### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

##### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

##### **Tier 3**

Option A- Support A2

Option B- Support B2

##### **Tier 4**

Support A

#### 4.2

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D2

#### **4.4.1**

Support B

#### **4.4.2**

Support B

#### **4.6.2**

Option B- Support B1-a

Option C- Support C3

Option D- Support D2

Option E- Support E2

best regards,

Dave

**From:** [Chesapeake Fishing Adventures](#)  
**To:** [Comments](#)  
**Subject:** [External] Public Comment on ASMFC's Draft Amendment 7  
**Date:** Thursday, April 14, 2022 8:04:10 AM

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Dear ASMFC,

I have been mulling over this "comment" for a couple of weeks now. Like so many others who support the abundance of striped bass, I want what I say to be taken seriously and have an impact. I am skeptical that my comment will even be read thoroughly and completely.

I am not a marine biologist, fisheries manager, scientist, striped bass behavior expert or hold any sort of title that would put me in a class of people qualified to make the decisions you all have to make. I don't envy your job one bit where you have to try and please all the people all the time, which is impossible.

I am a light tackle charter guide on the Chesapeake Bay. Strictly light tackle and strictly artificial lures. I am going into my 4th year as licensed captain and guide and going into my 2nd year where ALL my striped bass trips are CATCH & RELEASE ONLY. You heard that right. I have no problems booking trips where anglers simply want to CATCH & RELEASE striped bass using light tackle or on the fly.

Perception is oftentimes reality and the perception of the Striped Bass in the Chesapeake Bay is that it is in trouble. Myself and my guide colleagues fish yearly patterns and those patterns over the last several years have declined significantly in regards to the size of the fish, quantity and abundance of a consistent food source. Poor management, complacent management has not helped.

**PLEASE GIVE ATTENTION TO 5 ITEMS BELOW:**

1. PUT THE STRIPED BASS FIRST.
2. MANAGE FOR MAXIMUM ABUNDANCE & NOT MAXIMUM HARVEST.
3. STOP THE REMOVAL OF BREEDING FISH FROM THE POPULATION.
4. GET OMEGA PROTEIN OUT OF MY CHESAPEAKE BAY.
5. STOP DEMONIZING CATCH & RELEASE FISHING.

Thank you for your consideration. I love giving anglers experiences that will last their lifetimes and I want to continue doing so.

Best Regards,

--

Captain Brad Foxwell  
Chesapeake Fishing Adventures  
443-610-3826 - Mobile

[Chesapeake Fishing Adventures](#)

**From:** [Capt. TJ Karbowski](#)  
**To:** [Comments](#)  
**Cc:** [Justin Davis](#)  
**Subject:** [External] Striped Bass Amendment 7  
**Date:** Thursday, April 14, 2022 7:18:25 AM

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#### Amendment 7 Comments:

For hire customers pay a lot of money and expect a successful trip including something to bring home for dinner. In Connecticut we do not have other angling opportunities such as Rhode Island, Mass and New York. We do not have Cod, Haddock, Pollack, Shark or Tuna off our coast. Our businesses were built on Striped Bass. Striped Bass are the number one reason why customers book trips, and the potential to catch a trophy striper is our number one marketing tool. It has taken a few seasons for our customers to get used to and understand the new regulations. We went from a 2 fish harvest limit to 1 (50% in their eyes) and now they now have to release their "fish of a lifetime". Our business can only take so much. Bottom line is the customers still need to take home a few stripers for dinner. The 28" -35" slot limit has made our job very difficult but it has kept us in business. Any further restrictions would be DEVISTATING.

STATUS QUO AND NO SEASONAL CLOSURES!

THE ABLILITY TO MANAGE BY CONSERVATION EQUIVELANCY .

A TREBLE HOOK BAN TO REDUCE THE CATCH AND RELEASE MORTALITY RATE.

IMPLEMENT SENSIBLE ECOSYSTOM MANAGEMENT. PREDATOR/PREY RATIO TO LET ALL SPECIES THRIVE.

THE STRIPED BASS STOCK ASSESSMENT SHOULD BE PERFORMED CORRECTLY WITH ALL YEAR CLASSES BE CONSIDERED.

The Striped bass problem isn't purely rod and reel fisherman, its: contaminated spawning grounds, illegal poaching and Omega Protein killing them and their food source. What will happen to the 2015 year class as it enters the Chesapeake to spawn? Will they die as by-catch from a factory ship or will there not be enough menhaden in the Bay to sustain them. Will their eggs even be healthy enough to survive?? It's time to curb the whole problem, not just the rod and reel fishermen.

Thank you,  
Capt. TJ Karbowski  
Rock & Roll Charters  
Clinton, CT  
203.314.3765  
<https://rockandrollcharters.com/>



**From:** [PAUL TEBO](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 7:04:16 AM

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Please draft amendment 7, striped bass. Save the future for these fish.

Thank you:

Paul Tebo  
12 Hazel Ave  
Shrewsbury MA  
Hunterbird@aol.com

Sent from my iPhone

**From:** [Joe Webster](#)  
**To:** [Comments](#)  
**Cc:** [Sen. Dave Miramant](#); [Megan Ware](#); [Stephen Train](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 14, 2022 6:56:57 AM

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Hello ASMFC,

My name is Joseph Webster and I am writing to tell you to manage for the abundance of striped bass and to put in place the most restrictive and harm reducing legislation to ensure the future of striped bass on the east coast.

You have made the document way overly complicated and it deters people like me from commenting and weighing in on specific issues. That to me is one of the problems with this process. After attempting to make some sense of it here are some bullet points of my feelings.

1. Conservation equivalency is bullshit
2. Rebuilding stocks as fast as possible using the most drastic measures to ensure no more damage is done is essential
4. Promoting safe fish handling practices and catch and release fishing is essential
5. Do a better job of breaking things down to the public and listening to the public's voice

I work at a local tackle shop and my livelihood depends on these fish. Without them we not only loose a way to make a living but the culture and soul of the east coast. Please make the right decisions.

Joe

**From:** [Julian Fox](#)  
**To:** [Comments](#)  
**Cc:** [2022stripercomments@gmail.com](mailto:2022stripercomments@gmail.com); [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 6:34:07 AM

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Hi,

My name is Julian Fox and I live in UK. Like many others in the UK we travel annually (sometimes biannually) to fish the shores of the NE for Striped bass. I know that this year, at least 20 (there'll be many more) other UK fishermen will gather on the shores of Cape Cod at various time of year to fish for this iconic species.

Please be under no illusion how important a thriving a sustainable biomass of Striped Bass is to us, and also the economy of the coastal villages – the cafes, tackle shops, bars, hotels, gas stations and so on. Coming from the UK we all spend large amounts of dollars in the pursuit of this fish. We travel for more and bigger bass. If there are no stripers in abundance, we simply won't come.

I wanted to respond to your request for public comments on Amendment Seven.

Here are my choices:

4.1

Tier 1

A1

B1

C1

Tier 2

A2

B1

C1

Tier 3

A2

B2

Tier 4

A

4.2

B- None

C1, C2

D2

4.4.1

B

4.4.2

B

4.6.2

B1-a

C3  
D2  
E2

All the very best

Julian Fox

Solihull  
UK

**From:** [Matt Roach](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7 - Public Comments  
**Date:** Thursday, April 14, 2022 6:28:09 AM

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To the ASMFC Board:

I have been following the management of our Nation's striped bass stocks for some time, and Amendment 7 (in draft form now) is key to the future of my favorite fish, and most loved fishery. I'm excited for the opportunity to comment, and let the board at ASMFC know what I believe is the best approach to manage this public resource. As a lifelong angler who spends 50-75 days on the water a year, spends thousands of dollars a year on fishing for striped bass myself and with professional guides, and as someone who has introduced dozens of people to this fishery, I know I have a responsibility to play a role in protecting this fishery, as I know this ASMFC board does as well.

To be specific, I support management triggers that manage our stocks conservatively, for abundance, and for future generations of fishermen and women. Below are where I stand on the sections of Draft Amendment 7:

#### **Section 4.1 - Management Triggers**

On fishing mortality (F):

- I would like to see options A1, B1, and C1 implemented, which provides clear aggressive timelines to reduce F while tracking data year over year.

On spawning stock biomass (SSB) triggers:

- I would like to see Sub-Option A2 (2 year deadline to IMPLEMENT the rebuilding plan - we're already waited way too long).
- I would like to see Sub-Option B1, keeping the status quote to rebuild the SSB within 10 years.
- I would like to see Sub-Option C1 implemented, which tracks both SSB and F and if both exceed the target for two years, the management program MUST be adjusted to rebuild the biomass within the 10 year timeframe.

On Recruitment Triggers:

- I'd like to see Sub-Option A2 implemented, which would trip the recruitment trigger when the JAI indices estimate recruitment below 75% of the '92-'06 JAI. This period should be the benchmark.
- I'd like to see Sub-Option B2 implemented, which states that if the recruitment trigger is tripped, an interim value of F would be calculated using the low recruitment assumption, and if F from the terminal year of the most recent stock assessment is ABOVE the interim F target, the management program must be adjusted to recruit F to the interim F target within a single year.

On the Deferred Management Plan:

- I support Option A, which is that no deferred management action would be permitted, and that the board must respond based on assessment updates immediately, and cannot defer action.

#### **Section 4.22 - Measures to Address Recreational Release Mortality**

On Additional Gear Restrictions:

- I support Sub-Option C1, prohibiting a fisherman from using lethal devices to pull striped bass from the water.
- I support Sub-Option C2, meaning any striped bass taken by unapproved method would be returned to the water immediately without unnecessary injury.

On Outreach and Education:

- I support Sub-Option D2 - that all states must promote best handling techniques to reduce mortality.

#### **Section 4.6.2 - Management Program Equivalency**

On Option B - Restricting the use of conservation equivalency (CE) based on stock status:

- I support Sub-Option B1, meaning that Conservation Equivalency should be restricted, and not approved if a stock is overfished.

On Option C - Precision standards for MRIP Estimates for CE Proposals:

- I support Option C3, meaning that CE proposals should not be able to use Marine Recreational Information Program estimates, associated with percent standard error >30%.

On Option D - CE Uncertainty Buffer for Non-Quota Managed Fisheries:

- I support Sub-Option D2, meaning that an uncertainty buffer of 25% is required for all CE programs for non-quota-managed fisheries.

On Option E - Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries:

- I support Sub-Option E2 - proposed CE programs have to demonstrate their equivalency to the FMP standard percent reduction at the state-specific level.

Thank you for the opportunity to voice my views during this public comment period. I hope that the ASMFC manages this keystone fishery for abundance as much as possible going forwards. Given the state of the fishery, and the recent YoY surveys, the future will be bleak without taking steps to reduce SSB mortality and allow these remaining large fish to spawn and thrive.

Kind Regards,  
Matthew Roach

**From:** [Steve Winters](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 14, 2022 6:28:08 AM

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Dear Sirs, my name is Steve Winters. Thank you for allowing me to comment on Amendment 7. I have been a resident fisherman on Block Island R.I. Since 1982. I have personally witnessed the past crash and recovery of this very special game fish. I have fished commerciality for Shellfish and Fin fish. I have guided both surfcasters and fly fisherman on my beloved island. Here we are at a 25 year low with total devastation lurking. I have been very lucky to have lived the best days of the Striper. My hopes lay with you to save these great fish for my children and grandchildren. This amendment is very complicated and makes it difficult to comprehend. We are tired and very disappointed with past efforts to save these fish. We are united with ASGA and will no longer not be herd. I travel often to the Florida Keys flats fishing and admire what they have done with their fisheries. Why is it so hard to save a multimillion dollar industry where 90% of fish caught are released ? I suggest these options going forward. 4.4.1 Rebuild option B. 4.4.2 framework option B. 4.6.2 management Equivalency B1- Bc -B2b - C3 -D3 and E2. Tier 1 4.1 management triggers. Option A1 - B1 and C1. Tier 2 option A2 -B1 and C1. Tier 3 option A3 and B2. Tier 4 option A. 4.2.2 recreational release mortality option A - option C1 - option C2 and option D1. 4.4.1 Rebuilding plan option B. I thank you for considering my comments. Steve Winters P.O. Box 41 Block Island, R.I. 02807

**From:** [Clay Emerson](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 11:20:50 PM

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Dear Members of the ASMFC,

I grew up not far from the beach in Southern New Jersey. Despite being an avid fisherman in my youth through the late 80s and 90s, I never caught nor even saw a single striped bass. The reason for that is simple; the population had been decimated by fishing pressure. In fact, my first encounter with a striped bass did not occur until I returned to New Jersey in the mid-2000s. In recent years fishing for striped bass has become my primarily recreational activity. Unfortunately, I am only able to hear stories of “the good years” when there was an abundant population of striped bass. Until recently, striped bass were a perfect example of a successful management effort which restored the fishery from a mere shadow. I am very encouraged that the ASMFC is considering immediate efforts with Amendment 7.

I believe there is an increasing interest and economic value in recreational catch and release fishing for striped bass. Personally, I can confirm that I spend an inordinate amount of money in the local economy on boats, engine service, tackle, clothing, hand warmers, and more hand warmers.

The main point of my comment is to voice my support for Effort Control B2-a which would entail closures of all recreational harvest in spawning areas. I believe this option is enforceable; perhaps even more enforceable than the current regulations. I also believe that his measure would be an effective method to decrease the overall recreational fishing mortality. It seems that recreational harvest during this time is especially detrimental since it preferentially targets fish of reproductive size/age, female fish and fish that are actively spawning. Furthermore, the anadromous nature of striped bass makes them especially vulnerable as they become concentrated in upstream spawning areas. These closures should be coordinated on a state or regional level and should include all inland waters, not just the larger spawning areas. I believe the spawning stocks of some of the smaller tributaries help to ensure that the striped bass stock remains more resilient to natural environmental factors that impact spawning success and recruitment. These fish are a critical component of an abundant and resilient population.

As strong as I advocate for harvest closures in Effort Control B2-a, I am equally strong in my opposition to Effort Control B2-b which entails targeting closures. These would be extremely difficult to enforce and would not be nearly as effective at reducing recreational mortality. I believe angler education is imperative to reduce the 9% estimated mortality associated with recreational catch and release.

During the New Jersey public hearing I heard a few comments repeated that were concerning to me. First, multiple charter captains argued that without more data, no action should be taken. Arguably we may never have “enough” data to satisfy some of these commenters, however, the data we do have shows that action is indeed necessary. Some commentors suggested that hatcheries and stocking should be explored. I trust that you will not seriously consider this recommendation; this significant expense would be much better applied to angler education. I have provided my recommendations for each of the Amendment 7 Options below my signature.



In closing, I applaud the ASMFC for their efforts in the process and I look forward to an abundant and resilient striped bass population for me and my daughter to enjoy for decades to come. I hope that my young daughter will get to experience the thrill of responsible catch and release striped bass angling throughout her childhood; and that she will catch enough to make up for all the bass that I did not catch during my childhood.

Thank you for your efforts,  
Clay H. Emerson PhD PE CFM

#### Management Triggers

Tier 1: Fishing Mortality (F) Triggers

Option A- A1

Option B- B1

Option C- C1

Tier 2: Female Spawning Stock Biomass (SSB) Triggers

Option A- A2

Option B- B1

Option C- C1

Tier 3: Recruitment Trigger Definition

Option A- A3

Option B- B2

Tier 4: Deferred Management Action

Option A

#### Recreational Release Mortality

Option A

Option B- B2-a (Only)

Option C- C1 and C2

Option D- D1

#### Rebuilding Plan

Option B

#### Conservation Equivalency

Option B- B1-a

Option C- C3

Option D- D3

Option E- E2

**From:** [fishon8lmb@aol.com](mailto:fishon8lmb@aol.com)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Wednesday, April 13, 2022 10:07:06 PM

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I have been fishing for striped bass in Massachusetts for the past two decades. I have visited many areas frequently. There is no doubt in my mind the population needs help. We see less fish every year and I would love to bring my future children fishing. I fear we will be casting into an empty ocean if actions are not taken soon. States tripled bass board

members: [Dan.mckiernan@state.ma.us](mailto:Dan.mckiernan@state.ma.us), [ray@capecodfishermen.org](mailto:ray@capecodfishermen.org), [sarah.ferrara@mahouse.gov](mailto:sarah.ferrara@mahouse.gov)

**From:** [John Lefeber](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [Doug Caplan](#); [Adrienne O'Donnell](#)  
**Subject:** [External] Striped Bass Amendment 7 Commentary  
**Date:** Wednesday, April 13, 2022 10:05:24 PM

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To the Advisors and Board members of the Atlantic States Marine Fisheries Commission:

My name is John Lefeber. I am an avid recreational angler, currently living in Massachusetts. I have been fishing for Striped Bass since I was five years of age, living in southern Connecticut. I have caught and released bass from Long Island Sound all the way to the Damariscotta River in Maine and everywhere in between. I fish both on fly and spin, designing all the flies and lures I use to target these amazing fish. Fishing for Striped Bass is a passion of mine that I expect to be able to pass down to my kids and others in the future. Without protection this will not be possible in the Stripers current situation. Protecting striped bass stocks, safeguarding the recreational angling industry that relies on these fish, and ensuring that future generations of anglers can enjoy catching our coastal fishery are paramount. With this said, I wish to support the following options in the current Amendment 7 draft:

On 4.1 Management Triggers, I support:

- Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality
- Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold
- Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions
- Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, I support:

- Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method
- Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, I support:

- Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. We recognize this option may require more restrictive management measures than option A, which I support

On 4.4.2 Rebuilding Plan Framework, I support:

Option B to allow the Board to take direct management actions as well as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, “Management program equivalency (also known as “conservation equivalency” or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

I believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically, I support:

- Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level
- Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates
- Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries
- Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

Thank you for providing the opportunity to comment on Amendment 7. I look forward to learning the outcome of the upcoming stock assessment and to reading the final version of the Amendment.

John Lefeber

4/13/2022

Boston, MA

**From:** [RAY YEE](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Wednesday, April 13, 2022 10:00:58 PM

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I do not support amendment 7 due to the lack of enforcement and the current fines do nothing to deter poaching  
Sent from my iPhone

**From:** [Robert Dyer](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass, Go to 38 inch for a keeper. 36 inch worked in the 80's  
**Date:** Wednesday, April 13, 2022 9:47:52 PM

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Sent from my iPhone

**From:** [Michael Dooley](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [Stephen Train](#); [Sen. Dave Miramant](#); [Megan Ware](#); [Patrick Keliher](#); [Rep. JAY MCCREIGHT](#)  
**Subject:** [External] Amendment 7  
**Date:** Wednesday, April 13, 2022 9:26:03 PM

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To the commission:

My name is Mike Dooley and I am a resident of Maine. I am a recreational fly and light tackle angler. For ease of reading, below are my supported items for Amendment 7:

#### **4.1**

##### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

##### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

##### **Tier 3**

Option A- Support A3

Option B- Support B2

##### **Tier 4**

Support A

#### **4.2**

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D1

#### **4.4.1**

Support B

#### **4.4.2**

Support B

#### **4.6.2**

Option B- Support B1-a

Option C- Support C3

Option D- Support D3

Option E- Support E2

**First and foremost, we must end the use of conservation equivalency.** This practice is dodgy at best, and causes irreparable harm to the fishery- not to mention the irreparable damage in the public's trust in the ASMFC's ability to manage the fishery successfully. Frankly, the practice does not make logical sense.

**Second, I believe that Amendment 7 was entirely too complex and difficult to navigate for the typical angler without a background in marine/fisheries science.** In the future, I'd like to see a comprehensive summary document published alongside the full amendment draft in order to give anglers a starting point to process the information. The volume of jargon and technical language in the document, while thorough, may not encourage the public discourse and desire to understand that is so crucial in our civic process. We can do better.

My first experience saltwater fishing was with my grandfather in Rhode Island fishing for striped bass, a time in my life that sparked a passion that continues to this day and of which I hold many dear memories. I want my young daughter, and all future generations, to have the opportunities to fish like I did, if she so chooses. **If we do not act aggressively now to manage for abundance, and not for yield, I fear that future generations will not have the opportunity to experience this vibrant fishery - an entirely avoidable travesty.**

Thank you for the opportunity to comment on this matter.

Respectfully,  
Mike Dooley



**From:** [Jeff Boswell](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Wednesday, April 13, 2022 9:21:05 PM

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*Hi,*

*I have been fishing here in Massachusetts for my entire life, and have watched in recent years as the striped bass population has declined precipitously. Whatever the cause - Fishing pressure, development, environmental changes, technology, etc. - likely a combination of all of the above - the results have been unmistakable. I have great fear for what the years ahead will bring unless urgent action is taken to reverse their decline.*

*Therefore my hope is that the management board makes conservation of the species, and rebuilding the population, it's highest priority. I am personally onboard with whatever measures are necessary to achieve those two goals as quickly as possible.*

*I understand that there are those concerned with a loss of income that might come through greater restrictions and focus on conservation, and I truly feel for any who would be impacted. But taking no serious action is painfully shortsighted and will only lead to a decimated species and greater harm to all related commercial industries. Conservation is in all stakeholders best long term interests.*

*I thank you for your time.*

*Jeff Boswell*

**From:** [Justin Cordonnier](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7, personal comments  
**Date:** Wednesday, April 13, 2022 9:17:20 PM

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Hi,

As a recreational fisherman who has fished for striped bass for more than 25 years, I am very concerned about the current and future bass population, especially the large, female breeders. Please consider my comments below on Draft Amendment 7. Just to keep things simple, I'm presenting my preferences in an abbreviated format. I am in favor of the following:

4.1 Management Triggers:

Tier I, Fishing Mortality  
Option A, Sub Option A1  
Option B, Sub Option B1  
Option C, Sub Option C1  
Tier 2, Spawning Stock Biomass  
Option A, Sub Option A2  
Option B, Sub Option B1  
Option C, Sub Option C1  
Tier 3, Recruitment Triggers  
Option A, Sub Option A2  
Option B, Sub Option B2  
Tier 4, Deferred Management Plan  
Option A, Option A, status quo

4.2.2 Recreational Release Mortality:

Option C, Sub Option C1  
Option C, Sub Option C2  
Option D, Sub Option D2

4.4.1 Rebuilding Plan

Option B, Option B

4.4.2 Rebuilding Plan Framework

Option B

4.6.2 Management Program Equivalency

Option B, Sub Option B1  
Option C, Sub Option C3  
Option D, Sub Option D2  
Option E, Sub Option E2

Thank you for your consideration,  
Justin Cordonnier  
Needham, MA

**From:** [Edward Valitutto](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 9:13:18 PM

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Dear ASMFC,

I am retired and live on a lagoon in Manahawkin, NJ. I own a boat and fish from April through December - January through March are spent in Florida. I spend a considerable amount of money yearly on tackle, bait, boat maintenance, etc. Striped Bass are my favorite species and I want to see their continued / improved protection.

I support the following:

Section 4.1 Management Triggers

Tier 1: Fishing Mortality Management Triggers

Option A: I support Sub-option A1 (status quo) 1 year

Option B: F Threshold Trigger: I support Sub-option B1 (status quo)

Option C: F Target Triggers: I support Sub-option C1 (status quo)

Tier 2: Female Spawning Stock Biomass Management Triggers

Option A: Deadline to Implement a Rebuilding Plan: I support Sub-option A2

Option B: SSB Threshold Trigger: I support Sub-option B1

Option C: SSB Target Triggers: I support Sub-option C3.

Tier 3: Recruitment Triggers

Option A: Recruitment Trigger Definition: I support Sub-option A-2

Option B: Management Response to Recruitment Trigger: I support a variation of Sub-option B2

Tier 4: Deferred Management Action

Option A: I support No Deferred Management Action

Section 4.2.2 Measures to Address Recreational Release Mortality

Option B: Seasonal Closures: I support Sub-options B2 Spawning Area Closures

Option C: Additional Gear Restrictions: I support Sub-options C1 and C2

Option D: Outreach and Education: I support Sub-option D1

Section 4.4.1 Recruitment Assumption for Rebuilding Calculation

I Support Option B

Section 4.4.2 Rebuilding Plan Framework

I support Option B

Section 4.6.2 Management Program Equivalency

I support Sub-options B1-a and B1-c

I support Sub-option C3

I support Sub-option D1

Option E: I recommend referring this to the subgroup of ASMFC's management and science committee to provide further analysis of the

performance of CE programs relative to coastwide measures to help better inform this discussion.

**From:** [Kirk Marks](#)  
**To:** [Comments](#)  
**Cc:** [stripercoments@gmail.com](mailto:stripercoments@gmail.com); [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 9:00:54 PM

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Hello,

I'm a recreational fisherman in the mid-chesapeake bay. Striped bass are the species I grew up catching and my favorite species to target still today. I want the fishery managed for abundance, especially when it comes to large breeding class fish. Please find my comments below:

#### 4.1 Management Triggers

Tier 1: Fishing Mortality (F) Triggers

Support Sub-option A1 (status quo)

Support Sub-option B1 (status quo)

Support Sub-option C1 (status quo)

Tier 2: Spawning Stock Biomass (SSB) Triggers

Support Sub-option A2

Support Sub-option B1 (status quo)

Support Sub-option C1 (status quo)

Tier 3: Recruitment Triggers

Support Sub-option A2

Support Sub-option B2.

Tier 4: Deferred Management Action

Support Option A (status quo): No Deferred Management Action.

#### 4.2.2 Measures to Address Recreational Release Mortality

Support option A. SQ

Support Sub-option C1

Support Sub-option C2.

Support Sub-option D2

#### 4.4 Rebuilding Plan

##### 4.4.1 Recruitment Assumption for Rebuilding Calculation

Support Option B

##### 4.4.2 Rebuilding Plan Framework

Support Option B

#### 4.6.2 Management Program Equivalency (Conservation Equivalency)

Support Sub-option B1-a

Support Sub-option C3

Support Sub-option D2

Support Sub-option E2

Thank you for your time and consideration.

Cheers,  
Kirk Marks

***Kirk Marks Jr***

Freelance Creative  
Photography, Writing, Culinary

■ [443-822-8225](tel:443-822-8225)

■ [kirkamarks@gmail.com](mailto:kirkamarks@gmail.com)

■ [Kent Island, MD](#)

**From:** [Brendan Richards](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 9:00:44 PM

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Dear members of the ASMFC Atlantic Striped Bass Management Board,

My name is Brendan Richards and I am honored again to offer my comment regarding management options related to this wondrously esteemed gamefish. My writing to you now regarding Amendment 7 will follow in the same suit of my past writings to you: strong, unequivocal, advocacy for actions that rebuild this stock. I will not settle for less. Multitudes of my fellow anglers will not settle for less. My sincere hope is that you will not as well. If you do, you have my staunch promise I will keep commenting in favor of this fish's future until your minds are changed or our collective inaction has wrung the last dead striper from the cold depths of the sea. A dead fish at the dock is a piece of meat, and maybe some money, something none of us can take with us when we leave this Earth, and that of which we leave behind is about as everlasting as ourselves. Conversely, an ocean teeming with fish, a healthy stock of striped bass, is a natural monument, and an awesome one at that. Our stewardship of it is worth committing all that we can to. The world is a more joyous place with the striped bass in it, and we owe that joy to future generations and the fish themselves. All of my following comments are rooted in this mission. I support the following options:

#### **4.1 Management Triggers:**

##### **Tier 1: Fishing Mortality (F) Triggers**

- **Sub-option A1 (status quo): Reduce F to a level that is at or below the target within one year.**
- **Sub-option B1 (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.**
- **Sub-option C1 (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.**

With these options I would like to commend the board highly for their past prudence and due diligence. Each of these options bears the designation "status quo" and these are the strongest options for rebuilding the stock. Hesitancy and half measures will only protract the overfished state of the striped bass. You have already made the best decisions on this front, please keep

up the good work!

## **Tier 2: Spawning Stock (SSB) Biomass Triggers**

- **Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan**The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment.
- **Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].
- **Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

The act of rebuilding anything is a creative act. It produces a product. A "deliverable" as they say in the boardrooms and cube-farms. Deliverables do not occur efficiently, or even at all, without restrictions on time. They need deadlines to function. Rebuilding the striped bass is no different. Punting the end point down the timeline like a tin can in an alley will not create a resolution that is both effective and efficient in its goals. It will create a sprawling, ineffectual mess, something that's not a resolution at all.

## **Tier 3: Recruitment Triggers**

- **Sub-option A2:** The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years. The high recruitment reference period used for this trigger may be adjusted as recommended by the TC during benchmark stock assessments. This trigger alternative has a moderate sensitivity; it is more sensitive than the status quo but less sensitive than sub-option A3 (Figure 1). This trigger alternative would have tripped three times since 2003: NY in 2006; MD in 2010; MD in 2014 (Table 2).
-



**Sub-option B2. If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.**

A cornerstone of fisheries management is that little fish become big fish. They're two halves of any fishery's fate that cyclically engage to produce either sustainability or demise. To ignore issues in recruitment is folly. True, we cannot control every factor that affects recruitment. But, poor recruitment is something that the stock, anglers, and managers have to deal with. And the stock can't do much on its own accord, but we can. One of the few things we can control is the F target. If fewer fish are being recruited into the stock, our best means of preserving it is to take fewer out, regardless of the cause. To only view more stringent regulations on retention as punitive action for fishing gone bad, is juvenile, and those who think that way need to grow up. We have to do what we can, within our power, to help in the recovery of this stock when it is in jeopardy regardless of the cause.

#### **Tier 4: Deferred Management Plan**

- **Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.**
- **Sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury**

These options speak for themselves: tools for fish removal need to be non-lethal in order to minimize mortality, and likewise there needs to be a restriction on methods of take that have ramifications.

- **Sub-option D2: It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.**

The advent of informed users of this stock is undoubtedly an imperative aspect of rebuilding and preserving the striped bass. This is a factor that cannot be neatly described in metrics and numbers. Nor can any decree or regulation truly achieve it. The best means to do so are through education and outreach. I implore the board for their recognition of this, and I wholeheartedly endorse their encouragement of the states in this endeavor.

In conclusion, I would like to again thank you for the opportunity to comment on this amendment. I would also like to thank you all for your time and your efforts. By and large, I

sincerely believe that the board is on a sound trajectory to successfully rebuilding the striped bass. By enacting some of these other managerial options, that success will only further coalesce. This is a profoundly teachable moment in ecological management. From the striped bass, we've all learned that even the greatest success story can be squandered through collective inaction and ignorance. To say "No more, and never again" is to be on the right side of history. The angling public is screaming this, and I believe that the conscience of this board is doing the same. Your recent past actions have proven that. Continue down that path. It's the only one that keeps the gleam of this fish in the world. To preserve this thread through natural history and the generations who have enjoyed these fish before, now, and have yet to, is a legacy larger than any of us. It is also a duty larger than any of us, but it *is ours*. So I say "No more, and never again."

Sincerely,

Brendan Richards

**From:** [Ryan Kumicz](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 8:59:50 PM

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There are little things in this world that keep the everyday person sane.

And for me fishing for striped bass grays everything else out in my life. I am an avid fly fisherman and I choose this method of fishing because it is the most sufficient form of recreational fishing there is.

Eliminating and reconfiguring commercial size fishing limits is critical to this fishery as it is depleting by the day.

If you look into what Florida has done with snook and red drum by categorizing striped bass as a "game fish" we can uphold a more sustained fishery.

Please and thank you.

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[ryankumicz.com](http://ryankumicz.com)

**From:** [Christian Martin](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 Draft Comments-CMartin  
**Date:** Wednesday, April 13, 2022 8:55:34 PM

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Date: 4-13-22

Memo: Comments on Striped Bass Amendment 7

To the ASMFC,

I am writing to you today to voice my comments on Amendment Seven Draft Document for the management of striped bass.

Firstly, I would like to make clear my choices on the following proposed regulations:

4.1

Tier 1

A1

B1

C1

Tier 2

A2

B1

C1

Tier 3

A2

B2

Tier 4

A

4.2

B- None

C1, C2

D2

4.4.1

B

4.4.2

B

4.6.2

B1-a

C3

D2

E2

As an avid surfcaster and active member of both the Plum Island Surfcasters and the MSBA I am very concerned for the future of the striped bass in our waters. I don't think enough is being done quickly enough to protect them and I feel that what action has been taken was done so with great consideration for the commercial interest. This is absurdly short sighted and we

are now at the point in which we MUST put the fish first at all costs.

Please use your positions of influence to do the right thing, stand up for the striped bass, and end overfishing as quickly as possible. Please manage stripers for abundance, and not yield. Please don't wait until it's too late.

Thank you for your time,  
Christian Martin

**From:** [Robert Strayton](#)  
**To:** [Comments](#)  
**Cc:** [Michael Armstrong](#); [Rep. Sarah K. Peake](#); [LOWELL WHITNEY](#); [Dan Mckiernan](#)  
**Subject:** [External] ASMFC - Amendment 7  
**Date:** Wednesday, April 13, 2022 8:33:15 PM

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Having read the draft I disagree with both the assumptions and conclusions.

In Massachusetts there are two principal cause of Striper mortality: seals and commercial fishing. All of the commercial regulations not simply permit the removal of large brood females, but require the removal of the very females required to rebuild the stocks. There is simply no replacement for the large mature female stripers and their prolific spawning ability.

Coupled with a seal population widely out of balance, stripers don't stand a chance in Massachusetts. Mass DMF estimates that the current seal population of 30,000 to 70,000 animals consumes one-million pounds of fish every single day. Our entire ecosystem is so completely out of balance that to have a single apex predator consuming so much of all available species, most assuredly including juvenile stripers (relatively slow-moving, delicious & readily available in near-shore waters). The seals do not abide by any bag limits, size limits of fishing effort. The effort is sustained and unregulated.

Striper stocks began to crash as the seal population exploded over the last 20 years. I am old enough to remember when there were no stripers, old enough to remember when they returned, in abundance, and have watched as they have crashed again. The only things that changed during that cycle was the seal population, and the growth of the commercial fishery. These are the problems. Too much commercial pressure, far, far too many seals.

I would argue, vehemently, that 99% of all the stripers I catch and release survive and grow, for at least some short while, before they are devoured by a seal. Recreational mortality is unfounded, and unjustified. I fish for stripers primarily with fly tackle, but do also fish from my boat in the rips of Martha's Vineyard & Nantucket Sounds, Muskeget Channel and Wasque Shoals. Those fish I catch, and release (if I take one striper per year, that is a lot) are handled carefully, released quickly, and swim away strongly. Over 50 years of fishing, over tens-of-thousands of stripers caught, I can count on one hand the very few fish that didn't survive. It is typical bureaucratic nonsense to claim recreational fishing is the cause of striper mortality. It isn't.

It is such a travesty that our government serves only the interests of the rich, the powerful, the special interests, the dark-money campaign donors. To set the table for commercial interests, to ignore the very obvious seal problem, an entire ecosystem wildly out of balance, and to lay the blame at the feet of recreational anglers, those with the most to protect and to preserve is nothing but pure political cowardice.

Address the seal problem, cull the herds and let the Great White's manage the population, but all the great white's on earth cannot sufficiently cull the herds of seals on Muskeget Island, Monomoy and the National Seashore. We must cull the herds and then, and only then, could the sharks potentially manage the seal population (remember 6 months a year there are no sharks culling seals, only seals, eating fish).

Severely restrict, or abolish the commercial striped bass fishery. There simply is no reasonable, or logical way to manage a commercial fishery. Either the size and bag limits make a commercial fishery untenable and insolvent, or, you decimate the striper population already under extreme pressure and duress. I cannot see any way to create a financially viable wild striped bass commercial fishery, and that very unviability is what leads to abuses in the fishery in the first place. I know the captains, I know they kill everything they catch, regardless of size, or bag limits. There is simply no way to have a viable striper fishery so do away with the commercial fishery altogether.

This isn't really rocket science, as much as you want it to be; it's not. Seals, a massive over-abundance of seals is decimating the striper population, coupled with a commercial fishery targeting large brood females, an ecosystem completely out of balance, warming waters in primary spawning grounds all combine to create a perfect storm that striped bass cannot survive.

Please, for once, do the right thing. Abolish the commercial fishery, and look into a suspension of the MMPA to cull the seal population in Massachusetts.

Thank you for your time and attention.

Sincerely,  
Robert H. Strayton  
307 Chappaquiddick Rd  
Edgartown, MA 02539

**From:** [Chloe Grein](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 8:22:43 PM

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Dear Emilie Franke and the Atlantic State Marine Fisheries Commission,  
My name is Chloe Grein and I've lived on Long Island my whole life. I grew up fishing with my father who has many stories of the glory days of fishing. The stories of how fishing once was amazes me and my father says he hopes I'll be able to experience half of what he got to many years ago. I hope the same for my children which is why I support these following options on amendment 7

**Tier 1: Management Triggers:**

Option A1  
Option B1  
Option C1

**Tier 2: Female Spawning Biomass:**

Option A2  
Option B1  
Option C1

**Tier 3: Recruitment Triggers:**

Option A3  
Option B2

**Tier 4:**

Option A

**4.2.2: Recreational Release Mortality (we oppose B1 and B2)**

Option A  
Option C1  
Option C2  
Option D1

**4.4.1: Rebuilding Plan:**

Option B

**4.4.2: Plan Framework:**

Option B

**4.6.2: Management Program Equivalency:**

Sub-option B1a  
Sub-option B1c  
Sub-option B2b  
Sub-option C3  
Sub-option D3  
Sub-option E2



Thank you for your time and your effort you've made,  
Chloe Grein

**From:** [editor](#)  
**To:** [Comments](#)  
**Subject:** [External] Stripers  
**Date:** Wednesday, April 13, 2022 8:07:10 PM

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I strongly support all legislation that will help striped bass. This is a treasured resource that should be protected. The majesty of these fish, needs to be enjoyed for generations to come. Striped bass need our unwavering help.  
Capt. Vinnie Calabro/ Karen Ann Charters  
Outdoor editor for The Rockaway Wave  
[Sent from the all new AOL app for Android](#)

**From:** [Derek Cummings](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 8:05:31 PM

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Dear Representatives of the ASMFC,

My name is Derek Cummings & I am a 28-year-old resident in the state of New Hampshire. I am a passionate kayak angler throughout New England & am actively working on obtaining my guide license to run charters for striped bass.

I am reaching out to you today to express my utmost concern regarding the future of the Atlantic population of striped bass. Since 2016, I've closely followed ASMFC studies associated with breeding biomass, year of the young, recreational mortality & commercial harvest, to name a few.

In my opinion, the regulations, legislature & measures implemented to conserve striped bass based on the most recent data, have fallen short regarding the future of the fishery, along with public expectations.

While I will continue to be an advocate for the most aggressive conservation measures necessary, including a moratorium & consistent Atlantic coastwide regulations, I'd like to take a few minutes today to provide my public comment on Amendment 7. Please see below.

#### **4.1**

Tier 1

A1

B1

C1

Tier 2

A2

B1

C1

Tier 3

A2

B2

Tier 4

A

#### **4.2**

B- None

C1, C2

D2

#### **4.4.1**

B

#### **4.4.2**

B

#### **4.6.2**

B1-a

C3

D2

E2

Based on my attendance of the ASMFC hearings in New Hampshire, Maine & Massachusetts there is a unanimous consensus on the state of striped bass. Based on the data the ASMFC has provided for public consumption, there should be a unanimous consensus on the state of striped bass.

**Listen to the public comments. Listen to the declining data associated with breeding biomass & year of the young. Conserve striped bass for the next generation.**

Thank you for your time.

- Derek Cummings

**From:** [Adam Race](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 7:57:19 PM

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My name is Adam Race, I make a living on the working waterfront and fish the waters from Biddeford to Falmouth. I can't seem to understand how the CE system is beneficial to the striped bass populations, how people can be held accountable, and how it will improve our stocks in the future. The window for saving this species is closing and closing fast. I will be following up with the results, I hope to be on the positive side of history.

Adam Race

**From:** [Dean Clark](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 7:49:16 PM

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The mismanagement of striped bass is or should be an embarrassment to the ASMFC. Please re-think and re-value these precious fish for their greater worth (up to 100 times greater on a per pound basis favoring recreational versus commercial (NOAA)).

Stop pandering to the commercial interests who always want more allowable harvest. You only have to look back a couple of decades and realize now that you blew it by allowing for increased killing and thus we find ourselves in the on-going, regulated, overharvesting of the Atlantic coast population of striped bass. The economic loss to the recreational fishing industry (many billions of dollars) is 100% your fault.

By endorsing and promoting Conservation Equivalencies which EVERYBODY knows is a sham, you have created a culture of killing that flies in the face of responsible fisheries management.

Please factor into your decision making the fact that striped bass are the #1 recreationally sought after and most economically Valuable salt water fish in your Jurisdiction.

Please stop devaluing these fish. Protect the breeding females, insist upon slot limit compliance and prioritize the recreational value of these fish over that of their far lesser commercial value.

If you do not institute and enforce regulations that allow for the recovery of striped bass you are going to be held accountable and responsible. Many in the recreational community will see to it that your names are published your votes are made public and you will have to answer to the millions of recreational fisherman that have trusted you to do the right thing.

Dean Clark  
596 Franklin Street  
Duxbury, MA 02332  
508 769-9765

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"The only gifts we can receive are the ones we give away"

**From:** [Mark Bonvouloir](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Wednesday, April 13, 2022 7:09:40 PM

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I support the most stringent tiers to be adopted for the future of striped bass.  
We will all adapt accordingly and benefit from siding on the side of the resource.  
Thank you.  
Mark Bonvouloir

Sent from my iPhone

**From:** [Bill Sistad](#)  
**To:** [Comments](#)  
**Subject:** [External] Public comments for "Amendment 7"  
**Date:** Wednesday, April 13, 2022 6:45:47 PM

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It is time for ASMFC to act now on the decline of striped bass up and down the eastern seaboard. Instead started striped bass fishing during the first moratorium in the late 80's and have watched the stocks hit an all time high, and now is see we are almost where we were at back then. I have been fly fishing the Jersey Shore since 1990, and it is sad to see the numbers of fish in my state the last few years. The harvest of pre spawn fish right now in Raritan Bay is absolutely horrifying and measures should have been put in place years ago, also for other pre spawn areas. It is time for ASMFC to take immediate action so we don't end up where we were back in the early 80's. Sincerely, William A. Sistad



**From:** [Eric Sampson](#)  
**To:** [Comments](#)  
**Cc:** [2022stripercomments@gmail.com](mailto:2022stripercomments@gmail.com); [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Striped Bass Amendment  
**Date:** Wednesday, April 13, 2022 6:29:34 PM

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ASMFC Commissioners and staff,

I am writing to provide my comments and positions on the Amendment 7 document. I have become an avid recreational striped bass fisherman in Maine over the last five years. I feel the fishery should be MANAGED FOR ABUNDANCE, using science and data, not politics. The fishery needs better management and more aggressive measures that have a higher likelihood of protecting this fishery while rebuilding the stock. I support aggressive measures to rebuild this fishery in 10 years or less. I would support seasonal spawning closures but not the way the current draft is written. My hope is to ensure that my children and many future generations can continue to enjoy this amazing fishery.

Below you'll find a breakdown of my positions for each option.

#### **4.1**

##### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

##### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

##### **Tier 3**

Option A- Support A3

Option B- Support B2

##### **Tier 4**

Support A

#### **4.2**

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D1

#### **4.4.1**

Support B

#### **4.4.2**

Support B

#### **4.6.2**

Option B- Support B1-a

Option C- Support C3

Option D- Support D3

Option E- Support E2

Thank you for the opportunity to participate in this process,

Eric Sampson  
Freeport, Maine  
[ripple4@mac.com](mailto:ripple4@mac.com)

**From:** [Ross Kessler](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 6:06:35 PM

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I support the following management decisions for Amendment 7.

#### **4.1**

##### **Tier 1 Fishing Mort Triggers**

Option A- Support A1 SB have been in decline for a long time, time to take our collative feet off the gas

Option B- Support B1 same rationale

Option C- Support C1 Status quo

##### **Tier 2 SSB Triggers**

Option A- Support A2 Rebuilding is important

Option B- Support B1 Let's get a timeframe in place!

Option C- Support C1 Even if we have closed seasons

##### **Tier 3 recruitment Trigger Definition**

Option A- Support A2 is ok I'd prefer A3

Option B- Support B2

##### **Tier 4 Deferred Management Action**

Support A – let's get this done.

#### **4.2.2 Measures to Address Recreational Release Mortality**

Option B- **B2-b** Which I believe closes spawning areas from angling. Spawning animals should not be harvested, especially when numbers are compromised.

Option C- Support C2

Option D- Support D2

#### **4.4 Rebuilding Plan**

##### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

Support B - let's do what we can to increase numbers.

#### **4.4.2**

Support B

#### **4.6.2**

Option B- Support B1-a I have yet to see a cons equiv do anything but lower stock size. They are the evil loophole of fisheries management!

Option C- Support C3

Option D- Support D3

Option E- Support E2

Ross K Kessler  
rosskess1@gmail.com

**From:** [Matt Casieri](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Wednesday, April 13, 2022 6:06:29 PM

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To whom it may concern,

My name is Matt Casieri and I am a recreational fisherman out of Falmouth, MA. The intent of this email is to disclose my concern of the current Striped Bass fishery and express my support towards further restricting the regulations in place in attempts to revive the fishery to what it once was. My stance on the Tiers are as follows:

1. Tier 1
  - a. A1
  - b. B1
  - c. C1
2. Tier 2
  - a. A2
  - b. B1
  - c. C1
3. Tier 3
  - a. A3
  - b. B2
4. Tier 4
  - a. A
5. 4.2
  - b. NA (no seasonal closures)
  - c. C1 & C2
  - d. D1
6. (4.4.1) B
7. (4.4.2) B
8. (4.6.2)
  - b. B1-a
  - c. C3
  - d. D3
  - e. E2

Management Program Efficiency or Conservation Efficiency (CE) can not go on any longer. Striper conservation/regulation is a problem that needs to be attacked by all states equally in order to truly accomplish the goal at hand; reviving the currently dying Striper fishery.

Can you imagine if this was applied to a different scenario? It is happening right now with green initiatives throughout the world. I do not have an opinion on that matter (simply a comparison), but will green initiatives imposed by the US (or any individual country) truly make a difference on a global scale if the rest of the world doesn't follow suit? The obvious answer is no. This can be

directly tied back to the Striper regulations as almost 60% of harvested fish were taken out of New Jersey alone in 2020 (Northeast region). If this persists, it simply does not matter what regulations are imposed to the states that have made an effort towards conservation if the bulk of the problem stems from the one state that is ignoring the timing and importance of the problem at hand. Every state involved needs to be on the same page; all making a concerted effort towards our **UNITED** goal of a flourishing Striper population. The importance of this united front supersedes all other regulations that are being considered at this time.

I know one person's opinion will not lead to any policy change, but if we all go about this together, the regulation, policy and RESULTS will speak for themselves in years to come.

Thank you for your all of your time and efforts on this matter that many of us are so passionate about. *It truly is appreciated.*

All the best,  
Matt



**Matthew C. Casieri** | Operations & Controls Analyst  
**Appleton Partners, Inc.** | One Post Office Square | Boston, MA 02109  
T: (617) 338-0700 | F: (617) 338 2379  
[www.appletonpartners.com](http://www.appletonpartners.com)



Please note that as of February 7, 2022, Appleton Partners' offices have relocated to the 5<sup>th</sup> Floor of One Post Office Square.

**From:** [Steven Michael Bogdanowicz](#)  
**To:** [Comments](#)  
**Cc:** [Christine C. Bogdanowicz](#); [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Striped Bass Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 5:58:32 PM

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Dear ASMFC members,

We would both like to comment on Draft Amendment 7 for the management of Atlantic Striped Bass. In general, we support managing Striped Bass for abundance, and support a management regime that is flexible, responsive, science-driven, minimizes fishing mortality and rebuilds stocks quickly once conservative thresholds indicating reduced abundance (and ideally, before that) are tripped.

Specifically, we support the following options in the Draft Amendment:

#### 4.1 Mortality, Biomass and Recruitment triggers:

We support sub-options A1, B1, and C1 regarding mortality triggers. We feel these options complement each other and minimize the timeframe (to one year) for reducing mortality. With respect to spawning stock biomass triggers, we support sub-options A2, B1, and C1, which combined give the quickest timeframe for restoring biomass. Regarding recruitment, we support sub-options A2 and B2. Finally, we support option A with respect to no deferral of management action.

#### 4.2.2 Recreational Release mortality

We support sub-options C1 (use of only nonlethal devices) and C2 (immediate return to water). We also support sub-option D2, the promotion of education and outreach programs for reducing Striped Bass mortality.

#### 4.4 Rebuilding Plan

We support a "low recruitment regime" scenario (option B for section 4.4.1) when making assumptions about recruitment. We also support option B for section 4.4.2, which gives management even more flexibility to "change on the fly" as more data becomes available.

#### 4.6.2 Management Program (Conservation) Equivalency

We believe, strongly, that CE has been abused at times, historically, and adds levels of both risk and unfairness when attempting to rebuild Striped Bass stocks. We support restricting or eliminating the use of CE (option `B1-a) when stocks are overfished. We also support option C3 (PSE less than 30%) as a lower risk option for

MRIP estimates. We also support option D2, incorporating a degree of uncertainty when curtailing harvests. Finally, we support option E2, to ensure states meet their conservation goals.

To paraphrase Henry Beston, author of the *Outermost House*, Stripers "are not brethren, they are not underlings..they are other nations.." They are, however, other nations without a voice of their own. It's up to us to make sure the Atlantic coast teems with these fish, this non-human nation, for decades to come. Thanks very much for listening.

Sincerely,

Steve and Christine Bogdanowicz



**From:** [Daniel Findorak](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Comment for Amendment 7  
**Date:** Wednesday, April 13, 2022 5:34:39 PM

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My name is Dan Findorak and I am an avid surfcaster from the state of Connecticut. As someone who has gravitated back to fishing in my adult years as a way to connect with my father and brother as well as my young daughter, being able to recreationally fish for striped bass has meant the world to me.

Being able to target and find success fishing for stripers hinges on not just a healthy striped bass stock, but one that is managed for abundance up and down the Atlantic Coast. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Dan Findorak  
Milford, CT, Connecticut  
Email: [dmf0201@gmail.com](mailto:dmf0201@gmail.com)

**From:** [Anthony Sarcona](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Wednesday, April 13, 2022 5:11:08 PM

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Dear ASMFC,

Thank you for the opportunity for public comment on Draft Amendment 7. Having an effective interstate management plan for striped bass can be a turning point for the declining fishery. On behalf of myself, fellow Maine recreational anglers, and licensed guides who all rely on the migration of striped bass. We need a draft that will support long term stability and protect spawning grounds for continual growth. It's seems at the moment we are in a harsh decline and could quickly descend further to the end of the fishery all together.

I'd like to share my comment regarding the Management Program Equivalency, otherwise known as conservation equivalency. In scenarios like this the board is forced to take action and make decisions based on science and facts. I am not opposed to the idea and rationale for CE, however it's been shown in the past to be a loop hole for other states ie New Jersey' Addendum VI which enable anglers to harvest striped bass below the 28" and above the 35" mark. These types of roundabouts in the laws completely undermine the meaning of "slot fish" and the idea of attempting to revive a declining species.

Specifically, I support the following options;

- Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level
- Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates
- Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries
- Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level.

Thank you for your time and providing the opportunity to comment on Amendment 7. Hopefully insight from the public will assist you in making decisions and implement rules that only help the restoration of Atlantic Striped Bass. I look forward to reading the final version of the Amendment.

Sincerely,  
Tony Sarcona  
Maine Anglers

**From:** [Jeff Welch](#)  
**To:** [Comments](#)  
**Subject:** [External] striped bass ammendment 7  
**Date:** Wednesday, April 13, 2022 5:10:41 PM

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hey gents, thought send over my thoughts

I think the answer here is pretty simple here -- put slot limits in place, we have the empirical evidence from the redfish and snook fisheries to show how effective this method is at reviving biostock. nothing over set the limit at nothing over 30" is allowed to be harvested for 5 years and think about walking it back to 32" after that period of assessment.

--

Respectfully,

Jeff Welch  
Captain - Side-Linerz Charter Fishing  
301.752.0749

Thank you for your business!

**From:** [Jeff Perry](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Admendment 7  
**Date:** Wednesday, April 13, 2022 4:55:17 PM

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Please pass Amendment 7.  
The management of the striper population is critical.  
A striper is worth more alive than harvested.  
Support and pass Amendment 7.

Jeffrey Perry  
19 Partridge Run  
Charlestown RI 02813  
[jnperry55@verizon.net](mailto:jnperry55@verizon.net)  
401-789-9264

[Sent from the all new AOL app for iOS](#)

**From:** [Matthew Gino](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [Maureen Davidson](#); [Sen. TODD KAMINSKY](#)  
**Subject:** [External] Amendment 7 Comments  
**Date:** Wednesday, April 13, 2022 4:46:50 PM

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Good afternoon,

I just wanted to submit some of my thoughts as someone from the recreational side of the fishery that has worked on boats, in a fisheries lab and at a tackle shop.

In my life we've been moratorium free, and aside from the shift from 2 @ 28" to 1 @ 28/1 over 40", and our current, we haven't necessarily seen any drastic changes despite an apparent change in the dynamic of the fishery itself (being larger fish in larger quantities, further off the beach, significantly less fish overall in the bays, at least to the west). Off the top of my head I know larger fish are typically more fecund, but with no guarantees a 28" fish gets to 34", a larger size limitation may help to shore up SSB issues down the line.

I've often wondered what the effect of temporary locale moratoriums would look like on fishing mortality in high stress and high density areas like Block Island or the Rips at Montauk come August when that water is hot and lactic acid builds up in fish caught. Even the idea of something similar to Tarpon in Florida, where removal from the water of larger fish (over say 40", Off hand I don't know a fishes hardiness at a given size and fitness) is prohibited, could help to reduce. I think the circle hooks shift is on the right track, and over time through tackle shops completely shifting will be more effective in compliance. I largely agree that reduction in FM is imperative for a successful stock down the road. Firsthand, I have seen the failure of no-targeting closures at the tackle shop on the beach brown and sandtiger shark fishing, and I personally could never support something as brash and uncertain.

As far as a recruitment trigger goes, it just seems unacceptable that for a fishery as valuable as our Striped Bass fishery there just isn't an urgency to ameliorate or amend that as a trigger. I support the idea and usage of localized indices in that matter as they will ensure certain areas reduce their harvest in an effective manner, but would ultimately like to see more uniformity in coast-wide regulations.

Implementation of stricter measures and the precautionary principle for Striped Bass management strikes me as necessary. Long Island has watched fisheries decimated through reactivity in management and environmental changes, but by and large we didn't have the research available for say Winter Flounder that we do coast-wide for Striped Bass, as such 4.4.2 Option B as a measure makes the most sense. We know the regulatory regime of Striped Bass management CAN be dynamic, there is no real benefit derived from waiting and not acting with precaution.

CE cannot serve a coast-wide population. When that same fish swims from Maryland-NJ-NY-RI-MA there should not be 5 different size and bag limits, it seems as simple and arbitrary as that in the fishery's current state. Down the road it may make sense to impose a different size limit for say LIS and the Chesapeake fisheries as opposed to the NY Bight and Cape Cod Bay, but that can be figured out after a rebuild. Additionally, these CE restrictions may help foster a pressure on states like NJ to eliminate future implementation of falsity premised programs like 'Trophy Tags' that seemingly just lead to pay-for-play breeder harvesting, without any basis in anything.

Anyway, these are my comments on the Striped Bass fishery as I see it from a conservationist, tackle shop, and recreational fisherman's perspective.

Best,

--

**Matthew T. Gino**

The George Washington University Law School | Washington, D.C.  
JD Candidate | Class of 2024

**From:** [Chris Ruschaupt](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [Daniel Ryan](#); [MICHAEL LUISI](#); [Emilie Franke](#); [Patrick Geer](#); [MAX APPELMAN](#)  
**Subject:** [External] Atlantic Striped Bass Amendment 7-Public Comments  
**Date:** Wednesday, April 13, 2022 4:43:39 PM

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Good afternoon,

As a long-time Chesapeake Bay fisherman I have witnessed first hand the continual decline of the striped bass population as a direct result of poor management decisions, lack of focus on the long-term health of the entire Bay fishery (including menhaden management and water quality measures), and the failure to fully consider when determining harvest and size limits the enormous economic contribution a healthy and productive fishery has over the entire Bay region and mid-Atlantic/East Coast. As stewards of this fishery that extends far beyond the Chesapeake Bay, it is incumbent upon you to honor the public trust granted to decision makers and preserve and protect the striped bass population for current and future generations.

I, along with many recreational fisherman, fishing guides, business owners, and concerned citizens support the following options proposed within Amendment 7. We collectively encourage you to do the same:

#### **4.1**

##### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

##### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

##### **Tier 3**

Option A- Support A2

Option B- Support B2

##### **Tier 4**

Support A

#### **4.2**

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D2



#### **4.4.1**

Support B

#### **4.4.2**

Support B

#### **4.6.2**

Option B- Support B1-a

Option C- Support C3

Option D- Support D2

Option E- Support E2

Sincerely,

Chris Ruschaupt

**From:** [Courtney Roberts](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Wednesday, April 13, 2022 4:36:53 PM

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To the Commission;

As an avid Maine angler and member of the American Saltwater Guides Association, I am writing to you about the proposed Amendment 7 for striped bass management. For as long as I can remember, my summers have been spent chasing these fish. As a child, I laid awake all night waiting for my dad to come tell me it was time to hop in the truck. As an adult, sleepless nights are spent walking a beach in pursuit of a bite or staring at the ceiling deciding what topwater plug I will pull out of the bag for first light. This same excitement is shared by thousands and thousands of recreational anglers on the east coast. If you are familiar with the "On The Water Migration Map", I'm sure you see how much energy is stirred up with their initial post of the season, "they're back!". The migratory progress will be shared thousands of times until the migration finally reaches the rocky ledges of Maine.

Recently, these same passionate anglers have been coming out in droves to support positive changes in the management of this fishery by voicing their opinions on Amendment 7. ASGA Members and conservation-minded fishermen have done more in the last few years to protect and advocate for the striped bass than the Commission has in a decade. We are frustrated, discouraged, and disappointed. The public has lost their faith in the Commission's ability to manage this species responsibly, and rightfully so.

According to the ASMFC website, your first of eight objectives that guide your decision-making reads: "Manage interstate resources that provide for productive, sustainable fisheries using sound science". If sustainability was a top priority, the 2011 year class would have been protected. Instead, this stock was decimated and did not recruit. Striped bass were declared overfished in 2018, overfishing has been allowed to occur since. Blatant inaction by the Striped Bass Management Board continues to devastate the fishery.

For too long states have been allowed to abuse Conservation Equivalency; even worse, there is no one holding them accountable for their actions. Conservation Equivalency is neither conservation driven nor equivalent to better practices. Reining in the misuse of management tools as well as developing a more responsive and responsible management plan will ultimately lead to the success of the population. We need the most conservative triggers and fastest timeline for any rebuilding plans. Deferring these actions and lowering management triggers will be detrimental to the spawning stock biomass.

The eighth and final objective listed on the ASMFC website encourages involvement and interaction of all parties; "Strengthen interactions and input among stakeholders, technical, advisory, and management groups". There are a lot of people paying attention to what is going on in management right now. An army of stakeholders is going up to bat for the striped bass. It's the bottom of the 9th inning with everything to lose, anything other than managing for abundance is not good enough.

I appreciate the opportunity to comment and hope the board seizes this opportunity to regain

public trust,

Courtney Roberts

Below I have listed the options I support:

#### **4.1**

##### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

##### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

##### **Tier 3**

Option A- Support A2

Option B- Support B2

##### **Tier 4**

Support A

#### **4.2**

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D2

##### **4.4.1**

Support B

##### **4.4.2**

Support B

## **4.6.2**

Option B- Support B1-a

Option C- Support C3

Option D- Support D2

Option E- Support E2

Courtney Roberts  
Athletic Trainer  
Lake Region High School  
(207)400-9312

**From:** [Rob Wofchuck](#)  
**To:** [Comments](#); [Cheri Patterson](#); [RITCHIE WHITE](#); [Megan Ware](#); [dhw@cisunix.unh.edu](mailto:dhw@cisunix.unh.edu); [Dennis Abbott](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Wednesday, April 13, 2022 4:28:31 PM

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Dear ASMFC,

Please help save the striped bass fisheries by supporting the following in the draft amendment. It is critical to get the population back to healthy levels as soon as possible before it is too late. I support the following in the draft amendment.

#### 4.1 Tier 1

Option A Suboption A1  
Option B Suboption B1  
Option C Suboption C1

#### Tier 2

Option A Suboption A2  
Option B Suboption B1  
Option C Suboption C1

#### Tier 3

Option A Suboption A2  
Option B Suboption B2

#### Tier 4

Option A - I support this - No deferred Management option.

#### 4.2.2 Recreational Release mortality

Option C Suboption C1 - only nonlethal devices for removing fish from the water  
Option C Suboption C2

Option D Outreach Suboption D2 - please more outreach on safe handling and release

#### 4.4 Rebuilding Plan - I support Option B

#### 4.6.2 Conservation Equivalent (CE)

Option B - Suboption B1-a - No CE when the stock is overfished  
Option C - Suboption C3 - No marine recreational information program used with a percent standard error exceeding 30%  
Option D - Suboption D2  
Option E - Suboption E2

The time to act is now so please support the above option and save the striped bass population before it is too late. Thank you.

Robert Wofchuck  
Brentwood, NH

**From:** [James Ellis](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft amendment 7  
**Date:** Wednesday, April 13, 2022 4:11:54 PM

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Striped bass are in deep trouble. I have read Draft Amendment 7, and without making this a long comment on each option and sub option listed in the document please err on the side of conservation and the well being of the species on each and every one. Please take the most conservative option you can. I hope this is not too late.

Those of you who remember the crash in our striper populations in the late 1980's and early 90's can certainly attest to how bad things were then. Things are at least as bad now. Very restrictive measures were then taken to correct the population downfall. And they were very effective and rapid. Maybe they worked too well because regulations were amended rapidly allowing a very generous harvest of stripers. Regulations have changed over the years to address population downfalls and YOY index numbers. But none have gone far enough. Status quo and minimal changes haven't worked. The time is now. Please don't allow this to happen again. Thank you for your time and effort on this matter.

My motivation for addressing this matter is deeply personal. I am a thirteenth generation Cape Codder, lifelong fisherman and outdoorsman. Former saltwater fly fishing guide based in Cape Cod Bay. Mostly out of Barnstable Harbor. I guided extensively from 1996 until I stopped guiding in 2014. I just could not bring myself to charge people to take an expensive boat ride as the fishery, especially for shallow water skiff and wade fly fishing in Cape Cod Bay deteriorated to the point it was non existent except for a very short early season window. Thank you again for your consideration.

James R. Ellis  
417 Church Street  
West Barnstable, MA  
02668

**From:** [peterkar@megalink.net](mailto:peterkar@megalink.net)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] draftamendment 7  
**Date:** Wednesday, April 13, 2022 4:04:36 PM

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Hello there,

My name is Peter Driscoll, from Turner, Maine.

More to the point I am a passionate angler for striper bass here in Maine. I fish more than 25 times during the season, and have introduced over the years a number of friends who now share my addiction. I practice catch and release fishing, and have not intentionally killed a fish in several years.

We have a wonderful striped bass fishery here in Maine -- however it is a fishery that is totally dependent on adequate fish migrating here from more southern waters. Although there is a strong conservation here in here in Maine, in order to protect the fishery, ultimately we are dependent on either Federal oversight or the cooperation of our southern neighbors to support our fishery.

I have followed the deliberations of the ASMFC and understand that there is a critical meeting scheduled for May 4th. I wanted to add my voice to those who are advocating for science based and conservation focused regulations. I support the positions advocated by the American Saltwater Guides Association.

I appreciate the hard work and long meetings that have gone into developing these regulations. I look forward to your recommendations and strongly hope that they will support the maintenance of a strong fishery here in Maine.

Thanks

Peter Driscoll



**From:** [Tom Kling](#)  
**To:** [Comments](#)  
**Subject:** [External] Atlantic Striped Bass Regulations  
**Date:** Wednesday, April 13, 2022 4:03:31 PM

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Emilie Franke,

I am writing to you in regards to the powerpoint presentation of the options you are requesting public comment on. I am a life long recreational Striped Bass fisherman from NJ having caught my first Striped Bass in 1967, I am retired now and fish almost every day from April to the end of the year. I graduated Stockton State College in 1976 with a B.S in Marine Science so I do have some scientific background, although college was a long time ago now. I did find the presentation a bit challenging to get through have no real fishery science experience but I will give you what I feel are my best choices for your consideration.

4.1 Management Triggers

Tier 1, options A1, B1, C1

Tier 2, options A2, B1, C1

Tier 3, options A2, B2

Tier 4, option A

4.2.2 Recreational Release Mortality

Options A1, B2b, C1, C2, D1

4.4.1 Rebuilding

Option B

4.4.2 Rebuilding

Option B

4.6.2 Management Program Equivalency

Sub-Options B1a, B1c, B2a, B2b, B2c, C3, D3, E1

As a very committed user of the resource I generally only keep one Striped Bass/year and let the rest go, I think the worst problem we face in NJ is the spring fishery in the general Raritan Bay and Sandy Hook Bay areas. The bass stage here before going up the Hudson to spawn. These fish are pounded every day and night by both shore and boat anglers and mortality is high. Unfortunately poaching is also a problem as well. Closing off that fishery in the spring would go a long way to ensuring a better Hudson River contribution to the biomass. Right now these fish can be targeted starting on March 1<sup>st</sup>, I would rather see it not opening until May 15 to allow those fish to have a shot at contributing to the spawning effort.

Best regards,  
Thomas Kling

**From:** [gonchome@verizon.net](mailto:gonchome@verizon.net)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7 Comments  
**Date:** Wednesday, April 13, 2022 3:38:40 PM

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Dear ASFMC Commissioners:

I have been fishing since I was very young. It was my means of getting away from the stresses of life and today it remains the same for me. Fishing for striped bass has been my latest passion. I went from a shore-bound angler to being a boat owner just so to reach those fish just out of reach. Over the past several years, I have watched the population of bass plunge. They no longer inhabit the same spots that they have for years. I thought it was me but other fisherman that I've talked to are reporting the same thing – less and less stripers. Sure, some fishermen are still catching them but they are in very localized spots. No more are there big surface blitzes as in the past. We've squandered the abundant resource that was the striped bass to a mere fraction of what it was. This begs the question, what can be done to bring it back?

As I've learned more about the regulations surrounding the management of striped bass, I've been confused as to why Conservation Equivalency (CE) is allowed? When you remove more fish from the system, less fish are there to reproduce, especially when the population has plunged below the threshold level!! I support **Option B-1a** that would at least restrict the use of CE **until after the stock has sufficiently recovered!!**

I also support the rest of the positions and comments provided by the American Saltwater Guides Association. Finally, please remember that you should be managing the fish not to produce the biggest harvest but to promote a healthy population of the resource so that everyone can enjoy and benefit from it!!

Thank you for your time.

Jaime Goncalves  
Hopkinton, Massachusetts

**From:** [Alex Atack](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Wednesday, April 13, 2022 3:08:45 PM

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Hello, I am a passionate fisherman who grew up fishing for striper. In the past years, I have noticed the decline in the quality of fishing in the northeast. I, along with many others call for coast-wide regulations regarding striper so the true slot-limit will work. It's sad seeing so many loopholes being abused. I'm tired of the lack of action taken to protect the species and would like to see some change. Fishing for striper was such a formative part of my upbringing, and seeing the decline in population really breaks my heart. Lots of people dedicate their life to fishing for striper, and release every single one they catch. It's unfair for them to have to suffer the consequences of the actions the greedy people who abuse the loopholes take. Let us please see some positive change.

-Alex Atack

**From:** [michael hoey](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 3:03:18 PM

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Hello ASMFC,

I am writing in my support of the following options to draft amendment 7.

Striped bass fishery has seen its peaks and valleys through history and it is not hard to learn this if you do a little reading. It seems as though the valley we are heading into and have been for the past few years is more drastic than ones we already had to recover from way before my time. We have more ability to learn about fish stocks now, and a greater ability to spread awareness about regulations, stock levels and proper handling/releasing to decrease mortality rates. Action needs to be taken now and we as anglers are ready to facilitate that action.

It breaks my heart to learn that we now risk future generations to never experience their first hook up after multiple attempts that resulted in being skunked. They will never have the opportunity to become more in tune with the ocean in their pursuit of Striped Bass. They may never have the experience of sitting on a cold beach cracking jokes with friends in the dark for hours just waiting for that tug, or waking up in the middle of the night when the world seems still just for a chance to interact with a striped bass. Being one of the few large fish that venture close enough to shore to target without a boat this fishery presents opportunity to anglers from all economic/financial backgrounds up and down the east coast, and this is another reason they should be protected.

I am in support of the following options:

4.1 Management Triggers Tier 1: Option A1, B1, C1  
Tier 2: Options A2, B1, C1,  
Tier 3: Options A2 and B2  
Tier 4: Option A

4.2.2 Measurers to Address Recreational Release Mortality  
Options C1 and C2  
Option D2

4.4.1 Recruitment Assumptions for Rebuilding Calculation  
Option B

4.4.2 Rebuilding Plan Framework  
Option B

**From:** [max chronister](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Wednesday, April 13, 2022 2:56:57 PM

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Thank you for taking the time to read this, my name is Max Chronister and I've been fishing Long island my entire life. Ive fished all over the US and overseas an I must say I don't think I've seen an ecosystem as poorly managed as the north east. How many species need to be wiped out before the people in charge do the right thing? Atlantic salmon, pollock, and cod were all once plentiful here but now they've been reduced to nothing after centuries of overfishing, and now it seems striped bass are up next, after all they were an endangered species a mere 30 years ago. Striped bass are overfished, that isn't a personal opinion or observation, it's an objective fact that the 2018 NOAA stock assessment proved. The fact that theres the even need for a public hearing is ridiculous, if environmental management used so much as half a braincell they'd see just how often and easily striped bass populations get destroyed. There has never once been a sustainable regulation in place for striped bass, even 1 fish a day has proven to be far too much. Striped bass need far stricter coast wide limits in place for both recreational and commercial fisherman or they will be wiped out like so many other species on the east coast have.

**From:** [Evan Young](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Wednesday, April 13, 2022 2:50:17 PM

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Hello,

I don't wanna waste anyone's time so I'll get straight to the point. My name is Evan Young, and I have been fishing the waters of the northeast for the past 30 years or so. I was introduced to the world of striped bass by my grandfather in the 90s, and back then the population was strong. You could go out to any beach with a bunker chunk and a lawn chair, and catch quality fish. Since then I've noticed a steady decline in both the quantity and quality of fish being caught. Beaches that used to produce hundreds of fish each fall are now barren, and old spots that used to be lined up with fishermen are abandoned. I hope to one day share the same experiences I had with my grandfather with grandkids of my own, and the only way to guarantee the preservation of this tradition is to tighten regulations. We must save the striped bass by any means necessary, up to and including a coast wide moratorium on the fish for both recreational and commercial fishermen. The tradition of catching striped bass isn't unique to just my family. It's something shared by thousands, if not millions of people living throughout the northeast, and the only way to keep it alive is to take action now.

Thank you for your time,  
E.Y.

**From:** [Mike Wissel](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Wednesday, April 13, 2022 2:34:25 PM

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Dear Fisheries Managers,

I am an avid angler and resident of the State of Maryland. I believe some difficult but very important steps need to be taken in order to avoid a repeat of the catastrophic demise of the striped bass stock in the 1980s and subsequent moratorium. While it is true we are seeing a large abundance of striped bass in the Bay, every year that passes we see fewer and fewer larger, reproducing size fish. Protecting this spawning stock, or what's left of it, should be of the UTMOST importance to fisheries managers. I understand and appreciate that each state has different considerations but ultimately we (fisheries managers, recreational fisherman and commercial interests) should be doing whatever is best to keep as many spawning sized fish in the water rather than seeing how many we can take out. As a recreational angler I feel it is important to play my part in the sustainability of the fishery and feel that other stakeholder groups should do the same. In summary I believe the following should be prioritized:

- Enact reliable conservation measures to reduce fishing mortality in all fisheries in Chesapeake Bay and along the Atlantic Coast.
- Implement strong, enforceable management triggers linked to recruitment (spawning) failure and overfishing.
- Ensure that the Conservation Equivalency Program is constrained in a way that limits uncertainty and prioritizes rebuilding stripers using the most accurate data available and not the data which most fits a state's priorities.
- Invest in better state-based reporting systems to more accurately understand angler impacts on stripers.

As far as the feedback you are soliciting:

-Management triggers - What is most important is that the Board takes action when triggers are tripped and pro-actively reduces fishing mortality when recruitment falters and removals affect the SSB status and the act in the quickest manner possible.

-Circle hooks are a valuable resource which should be mandated in bait fisheries

-Targeting of spawning or post-spawn striped bass should only be permitted when the impact can be quantified and is meaningful. I strongly urge managers do not implement non-targeting closures that cannot be quantified or implemented when prevailing conditions and accompanying regulations are known to have a limited impact on removals, but allow important access and economic benefit.

-States should be required to develop public outreach & education campaigns

-Develop and execute specific studies to balance recreational fishery access with quantifying impacts on the stock by allowing measured access to the fishery.

I also understand that specific actions for the Commercial sector's impact are not being reviewed in this Amendment. However, I would urge the Board to take a comprehensive view of the fishery and all its stakeholders. While the last benchmark assessment put a spotlight on the recreational sector's release mortality numbers, the data behind it (using MRIP) was flawed and has caused conflict and instability in other shared fisheries, namely, Summer Flounder, Scup and Black Sea Bass in the Mid-Atlantic region. As far as rebuilding, given the known and unknown impacts of prevailing spawning habitat value, environmental drivers on

reproduction and changes in natural mortality throughout the Chesapeake Bay and its tributaries, the Board should task the Technical Committee with developing projections that include even lower assumptions about reproductive success and future recruitment into the striped bass stocks and fisheries. The impact of invasive species, forage availability, poor water quality, and climate change should be a high research priority that guides overall strategies for harvest and overall removals from all components of the striped bass fishery coastwide.

I thank you for your time and consideration and I again urge you to do what is in the best interest of the fish and not any one sector or region.

Respectfully,  
Michael Wissel  
Westminster, MD



**From:** [Bill LeConey](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 2:29:42 PM

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My name is Bill LeConey and I am an avid boat fisherman from the state of New Jersey. The striped bass fishery here in Nj is not just a recreational activity for me. Many of my friends and acquaintances make a living on the water, specifically off the popularity of the striped bass. Ensuring they remain a sustainable resource should be top priority for everyone who enjoys and depends on them. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Bill LeConey

Atco, New Jersey

Email: [billy25883@gmail.com](mailto:billy25883@gmail.com)

**From:** [Charlie Levine](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 2:24:52 PM

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To Whom It May Concern:

I am not a fisheries wiz, but I can tell you with no uncertain terms the importance of striped bass from an economical and quality of life standpoint. As a longtime fishing journalist, having worked on magazines like Sport Fishing, Marlin and now Anglers Journal, I want to confirm to you what I hope you already know. The striped bass is the single most important game fish on the Mid-Atlantic and Northeast coasts. When I was a kid growing up in Connecticut in the 1980s, you couldn't find a bass. I saw the species come back and thrive but it's time to make changes to protect the species for the future. I stand with the ASGA on the issue of Conservation Equivalency.

I ask you to support the recommendations of the ASGA in regards to Management Triggers, Spawning Stock Biomass Triggers, Recruitment Triggers and the importance of education. Let's work together. Let's manage striped bass for the future.

Thanks for your consideration,

**Charlie Levine**

Executive Editor, [Power & Motoryacht](#)

Senior Writer, [Anglers Journal](#)

407-222-3893

**From:** [Tom Schaefer](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Wednesday, April 13, 2022 2:22:18 PM

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Hello,

I want to thank you for considering my comments on this issue. Some key factors for me that jump out on amendment 7 are in the conservation equivalence section. We cannot continue to use CE programs when the fishery is below a healthy stock. We need to rebuild the stock and ensure the health of the striper population.

In the Recreational Release mortality section, under the B1 section, I have a few issues. The targeting closures will be extremely hard to police, and it will put many small businesses owners in a dire situation without having a quantitative positive impact on the striper stock. Many light tackle guides particularly in the northeast have a minimal impact on bass mortality and this will negatively affect these individuals ability to make a living. Conversely, people will be able to harm stripers by targeting other species.

Lets advocate for this incredible resource and make sure we take action in rebuilding the stock of this incredible animal.

#### **4.1 Management Triggers**

Tier 1: Fishing Mortality (F) Triggers

##### **Option A: Timeline to Reduce F to the Target**

**Thomas Supports Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year.

##### **Option B: F Threshold Triggers**

**Thomas Supports Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

##### **Option C: F Target Triggers**

**Thomas Supports Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

Tier 2: Spawning Stock Biomass (SSB) Triggers

##### **Option A: Deadline to Implement a Rebuilding Plan**

**Thomas Supports Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

##### **Option B: SSB Threshold Trigger**

**Thomas Supports Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

##### **Option C: SSB Target Trigger**

**Thomas Supports Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

Tier 3: Recruitment Triggers

##### **Option A: Recruitment Trigger Definition**

**Thomas Supports Sub-option A2:** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment

(NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

#### **Option B: Management Response to Recruitment Trigger**

**Thomas Supports Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

Tier 4: Deferred Management Action

#### **Thomas Supports Option A (status quo): No Deferred Management Action.**

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

#### **4.2.2 Measures to Address Recreational Release Mortality**

##### **Option C. Additional Gear Restrictions**

**Thomas Supports Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**Thomas Supports Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

##### **Option D. Outreach and Education**

**Thomas Supports Sub-option D2:** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

#### **4.4 Rebuilding Plan**

##### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

**Thomas Supports Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

##### **4.4.2 Rebuilding Plan Framework**

**Thomas Supports Option B:** 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 recruitment assumption specified in Amendment 7) 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.

##### **4.6.2 Management Program Equivalency (Conservation Equivalency)**

###### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

**Thomas Supports Sub-option B1-a:** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

###### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

**Thomas Supports Sub-option C3:** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

###### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

**Thomas Supports Sub-option D2:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

**Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

**Thomas Supports Sub-option E2:** the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Thank you for your consideration,  
Thomas Schaefer

**From:** [Kurt Long](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Wednesday, April 13, 2022 1:58:51 PM

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To the ASMFC

My name is Kurt Long. I am from Maryland and I am responding to the request for public comments on Amendment Seven for the management of striped bass.

Here are my choices for each proposed regulation.

#### **4.1**

##### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

##### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

##### **Tier 3**

Option A- Support A3

Option B- Support B2

##### **Tier 4**

Support A

#### **4.2**

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D1

#### **4.4.1**

Support B

#### **4.4.2**

Support B

#### **4.6.2**

Option B- Support B1-a

Option C- Support C3

Option D- Support D3

Option E- Support E2

I have done a lot of research on this issue and I chose to stand with the American Saltwater Guides Association. I believe that swift and effective action is the only way to preserve this incredible commodity.

Please stand up for the striped bass, and end overfishing as quickly as possible.  
Please manage stripers for abundance, and not yield!

Thank you

Kurt Long



**From:** [Stuyve Pierrepont](#)  
**To:** [Comments](#)  
**Cc:** [RS Pierrepont](#)  
**Subject:** [External] Striped Bass Regulations  
**Date:** Wednesday, April 13, 2022 1:50:03 PM

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It is time ASMFC recognize the role they now hold for fisheries. You are now the last line of defense for our fisheries. If you don't save our striped bass while we still have a small opening, one more species will become endangered on your watch. It is time for you to be the tough cop and tell all parties we are not going to take the precautionary road to a recovery is clear. There are just too many fishermen with overly efficient technology to not be cautious. Stand up for what is right!

Sent from mobile device. Please excuse brevity, auto corrects, spelling, punctuation. Please call 917 282 5110 if need to speak. [Stuyve.Pierrepont@Marsh.com](mailto:Stuyve.Pierrepont@Marsh.com)

**From:** [Carson Turowski](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 1:47:06 PM

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Dear ASMFC,

I am a recreational angler living in Newport, Rhode Island. I fish (catch and release) for striped bass as much as I can from shore, boat, and kayak. I would love to see others have the ability to experience fishing for stripers this way for years to come. I believe that striped bass should be managed for abundance, using the most conservative measures proposed to allow for us to see this species thrive for years to come. The striped bass are clearly in danger. Consequently, my positions on the proposals within the Draft Amendment Seven are listed below:

- Fishing mortality management triggers
  - Timeline to reduce fishing mortality to the target:
    - I support option A-1 (status quo)
  - Fishing Mortality Threshold Triggers:
    - I support option B1 (status quo)
  - Fishing Mortality Target Triggers:
    - I support option C1 (status quo)
- Female spawning stock biomass management triggers
  - Deadline to initiate rebuilding
    - I support option A-2
  - SSB Threshold Triggers
    - I support option B-1 (status quo)
  - SSB target triggers
    - I support option C-1 (status quo)
- Recruitment triggers
  - Recruitment trigger definition
    - I support option A-3
  - Management Response to Recruitment Triggers
    - I support option B-2
- Deferred Management Action
  - I support option A (status quo)
- Fishing season closures
  - I support option B-1
- Gear restrictions
  - I support options C-1 and C-2
- Angler education

- I support option D-2
- Recruitment Assumption for Rebuilding Calculation
  - I support option B
- Rebuilding Plan Framework
  - I support option B
- Management Program Equivalency
  - I support options B-1a and B-1c, B-2b, C-3, D-3, and E-2

Thank you for all you have done managing striped bass and taking the time to read my position on Draft amendment seven.

Very best,  
Carson Turowski  
35 Simmons St.  
Newport, RI 02840  
410-903-3439

**From:** [Michael Dean](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [Emerson Hasbrouck](#); [maureen.davidson@ny.dec.gov](mailto:maureen.davidson@ny.dec.gov); [james.gilmore@ny.dec.gov](mailto:james.gilmore@ny.dec.gov); [carol.hoffman@ny.dec.gov](mailto:carol.hoffman@ny.dec.gov); [Sen. TODD KAMINSKY](#)  
**Subject:** [External] Amendment 7  
**Date:** Wednesday, April 13, 2022 1:44:39 PM

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Good afternoon. Striped bass plays an enormous role in my life. In the past 15 years it has ignited a passion in me. The bond with my now 10 year old son and the time we spend fishing is nothing short of amazing. Sharing my experience and ever growing knowledge base through articles I pen for The Fisherman magazine, On the Water magazine, along with weekly video reports is an honor to have the ability to partake in. Introducing post combat veterans to the power of fishing through my work with The Manhattan Cup and Freedom Fighter Outdoors is a privilege I'm blessed to have.

I appreciate the hard work that everyone involved in protecting and managing our resource puts in. That said, I fear the day that the hope for a rebound in the fishery will be out of reach threatening livelihoods and passions. I urge your support for the choices listed below to preserve and grow the most iconic fish that swims in our waters.

### **Tier 1: Fishing Mortality (F) triggers**

**Option A: Timeline to Reduce F to the Target Sub-option A1 (status quo)**

**Option B: F Threshold Triggers Sub-option B1 (status quo)**

**Option C: F Target Triggers Sub-option C1 (status quo)**

### **Tier 2: SSB Triggers**

**Option A: Deadline to Implement a Rebuilding Plan Sub-option A2**

**Option B: SSB Threshold Trigger Sub-option B1 (status quo)**

**Option C: SSB Target Trigger Sub-option C1 (status quo)**

### **Tier 3: Recruitment Triggers**

**Option A: Recruitment Trigger Definition Sub-option A2**

**Option B: Management Response to Recruitment Trigger Sub-option B2**

### **Tier 4: Deferred Management Action**

**Option A (status quo)**

## 4.2.2 Measures to Address Recreational Release Mortality

Sub-option C1

Option D. Outreach and Education

Sub-option D2

## 4.4.1 Recruitment Assumption for Rebuilding Calculation

Option B

## 4.4.2 Rebuilding Plan Framework

Option B

## 4.6.2 Management Program Equivalency

Option B. Restrict the Use of Conservation Equivalency Based on Stock Status

Sub-option B1-a

Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals

Sub-option C3

Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries

Sub-option D2:

Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries

Sub-option E2:

Thank you again for your time and hard work.

Mike Dean

*Mike Dean  
Founder  
Manhattan to Montauk  
@mnhtn2mtk  
Manhattancup.com  
Onthewater.com/Manhattan-cup*

Sent from My iPhone

**From:** [Lawrence Olds](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass  
**Date:** Wednesday, April 13, 2022 1:43:01 PM

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I grew up fishing with my Dad in the York, Rappahannock rivers and the Chesapeake Bay. I just wanted to voice support for the conservation of this fish (and the ecosystem).

Please do all you can to save this national treasure!

Lawrence Olds

**From:** [john harrell](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 1:34:26 PM

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We all have to do our part in saving our striped bass so our kids kids may enjoy such a fish

Sent from [Mail](#) for Windows



**From:** [Tony Frascotti](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 1:34:25 PM

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April 13, 2022  
Emilie Franke  
Fishery Management Plan Coordinator  
Atlantic States Marine Fisheries Commission  
1050 North Highland Street, Suite 200A-N  
Arlington, Virginia 22201

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board (Board):

I would like to thank you for the opportunity to comment on Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass.

I strongly urge the Board to take decisive action to rebuild the striped bass fishery and establish management reforms that position the Atlantic striped bass stock for long-term abundance and stability. The need for action is critical given that spawning stock biomass is at a 25-year low and that the three most recent young-of-year indices in upper Chesapeake Bay are among the lowest on record. While the draft amendment includes much-needed changes to improve the outlook for striped bass, it also includes potential pitfalls, particularly on the topic of management triggers, that raise concern. In the paragraphs below, I have outlined my positions on each of the decision points for the four major issues contained in the draft amendment.

Striped bass are the single most important recreational gamefish in the Northeast, in my opinion. They typify saltwater fishing and are core to our ethos as fishermen in this region of the country. They are such a unique resource and so widely enjoyed by so many people. Supporting the fishery would allow a decades long tradition of striped bass fishing to continue and prosper. I am not a commercial fisherman, nor am I someone whose livelihood is tied to that of the fish. However, these fish are deeply important to who I am as a person. My father introduced me to them and some of my best moments with him were catching striped bass. If we don't properly conserve the species, I will never have the opportunity to pass forward this tradition to the next generation, which I think is so critically important in an increasingly "inside" world.

Striped bass are at the core of the East Coast's recreational fishing community and economy, and all eyes are on the Striped Bass Board as you decide the fate of the ASMFC's flagship species. Please take this opportunity to position this treasured species for recovery and long-term success.

#### **4.1 Management Triggers**

##### **TIER 1 OPTIONS: Fishing Mortality (F) Triggers**

- **Option A:** Timeline to Reduce F to the Target

**I support Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year. I believe that wherever possible the board should move as quickly as possible to reduce fishing mortality. Sub-option A1 offers the shortest timeframe to get it back below the target.

- **Option B: F Threshold Triggers**

**I support Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

- **Option C: F Target Triggers**

**I support Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

## **TIER 2 OPTIONS: Female Spawning Stock Biomass (SSB) Management Triggers**

- **Option A: Deadline to Implement a Rebuilding Plan**

**I support Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment.

- **Option B: SSB Threshold Trigger**

**I support Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

- **Option C: SSB Target Trigger**

**I support Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

## **TIER 3 OPTIONS: Recruitment Triggers**

- **Option A: Recruitment Trigger Definition**

**I support Sub-option A3:** The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model (NY, NJ, MD, VA) shows an index value that is below the median of all values in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years. The high recruitment reference period used for this trigger may be adjusted as recommended by the TC during benchmark stock assessments. This trigger alternative has a higher sensitivity than both the status quo trigger and sub-option A2 (Figure 1). This trigger alternative would have tripped six times since 2003: NY in 2006; MD in 2008; MD in 2009; MD and VA in 2010; NY in 2013; MD in 2014 (Table 2). The status quo

(current trigger) has only been tripped once in the time period between 2003-2020, clearly it is not sensitive enough based on where the stock is currently at. A2 would have tripped the trigger 3 times in that same time period. A3, while classified as a “high sensitivity trigger”, would have tripped the trigger 6 times in that same time frame. As with the other options supported, I believe the board needs to operate with more caution moving forward, being aware of and addressing years of low recruitment ASAP.

- **Option B: Management Response to Recruitment Trigger**  
**I support Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year. In the past, the board has failed to adjust F to account for both good and bad year classes (recruitment). With several recent years of poor year classes I ask the board to be more responsive to these shifts. B2 puts an interim F target adjustment in place if the recruitment trigger is tripped.

#### **TIER 4 OPTIONS: Deferred Management Action**

- **I support Option A (status quo):** No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger. I cannot support any options which allow the board to defer action if a management trigger is tripped. Options B-F all allow for deferred action by the board in the event of a management trigger. Given where the stock is currently at, overfished with overfishing occurring, the “Board’s concern about the frequent need for management action due to triggers tripping with each stock assessment update or benchmark” is quite frankly, absurd. Stock assessments are typically conducted every 2 years (COVID delayed the last one) and benchmark assessments every 5 years. If the board needs to convene and take action more frequently to maintain a healthy stock then so be it.

#### **4.2 Recreational Fishery Management Measures**

- **Option B: Effort Controls (Seasonal Closures)**  
**I support Sub-option B2.** Spawning Area Closures: The Board can select either or both of the following sub-options B2-a and B2-b. Multiple states currently have spawning closures in place with closure boundaries defined by those states. Existing spawning closures would be applied toward meeting the requirements of the selected option(s).<sup>15</sup> Spawning area closures during the spawning season could contribute to stock rebuilding by eliminating harvest and/or reducing releases of spawning and pre-spawn fish. Reducing releases during this time is particularly important to reduce stress and injury to fish as they move into lower salinity spawning areas. If new information on the timing of striped bass spawning is available in the future, the TC would conduct a review of that research and recommend changes to the timing of spawning closures if needed. If this option is selected, CE would not be permitted.
- **I support Sub-option B2-b.** No-Targeting Spawning Closure Required: All

recreational targeting of striped bass would be prohibited for a minimum two-week period on all spawning grounds (not necessarily the entire spawning area) during Wave 2 (March-April) or Wave 3 (May-June), as determined by states to align with peak spawning. States will determine the boundaries of spawning ground closures. Closures prohibiting recreational targeting on spawning grounds have already been implemented in Maine (Kennebec River), New Jersey (Delaware River), and Maryland (Chesapeake Bay) during part of Wave 2 and/or Wave 3 (Figure 4).

This is an important one! And while this is a complex section of Amendment 7 I believe it is vital to the recovery of the SSB and stock as a whole. Sub-option b2-a would prohibit harvest but allow for catch and release, b2-b would be a no targeting closure and would provide the best protection for the SSB while they spawn. The option is somewhat open ended with the language calling for a “minimum two-week period,” I would like to see it closer to a four or six week period in order to see the best results and gain the most protection for the SSB. Many other species benefit from shortened seasons or spawning closures and Striped Bass should as well. Considering the stock is currently overfished with overfishing occurring, the least we can do is allow for uninterrupted spawning. The argument that Striped Bass would be a bycatch while fishing for Bluefish or other species is mostly null as Bluefish do not show up in great numbers until after this timeframe. The uncertainty regarding these options surround the definition of the spawning areas and the possibility that states may need to work together to provide the most amount of protection for the SSB as they stage ahead of the spawn and then move up into the river to do so. The best example of this is the case of the Hudson River where fish stage in Raritan Bay, New Jersey before ascending the Hudson River to spawn in NY. In a best case scenario this targeting closure would not only protect the spawning grounds but also the areas in which the SSB congregates prior to spawning, they go hand in hand. Despite these uncertainties I support these options with the hope that the TC and board will work together to develop these areas. Overall these options err on the side of caution but with the Striped Bass SSB and stock as a whole being in such a dire situation, I believe any gain, no matter how big is worth the risk involved.

- **Option C: Additional Gear Restrictions**

**I support Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**I support Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury. These options are a no brainer. Let’s prevent the use of gaffs for removing fish from the water in the event that they would need to be released as slot limits require more fish to be released. C2 would require non circle hooked fish (J-hook when fishing for other species) to be returned to the water as soon as possible and with careful handling. Both of these measures combat recreational release mortality which has been determined to have a large effect on F.

- **Option D: Outreach and Education**

**I support Sub-option D1:** States would be required to promote best striped bass handling and release practices by developing public education and outreach campaigns. States must provide updates on public education and outreach efforts in annual state compliance reports. States collect license fees and I believe some of that

money should be spent on angler education and more specifically catch and release best practices. Option D2 only recommends that “states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns.” I believe that this should not just be a recommendation but a requirement. Angler education is an essential method to help curb recreational release mortality and ultimately help rebuild the stock to abundance.

#### **4.4 REBUILDING PLAN**

##### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

- **I support Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis. As I have mentioned, young of year over the past 3 years has been well below average. Combine this with the fact that Addendum 6 only addressed mortality and not rebuilding the stock and now we are in a terrible spot. The writing has been on the wall for years, if you were on the water it was clear that the stock was in trouble. Option B bases the rebuild of the SSB on the ‘low recruitment regime assumption,’ more in line with the poor year classes previously mentioned. It would likely achieve a lower level of removals and require more restrictive management measures.

##### **4.4.2 Rebuilding Plan Framework**

- **I support Option B:** 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 recruitment assumption specified in Amendment 7) 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. A new stock assessment will be published in October 2022 and depending on the outcome it may have a massive impact on the measures being put in place by Amendment 7. It is an unfortunate situation and likely could have been avoided if the board took action sooner but it is a concession we should be willing to make to prevent a further delay in developing and putting into action an addendum to Amendment 7. As noted it appears the board is willing to allow some sort of public involvement in the process. “Under this option, public comment could be provided during Board meetings per the Commission’s guidelines for public comment at Board meetings, and/or public comment could be provided in writing to the Board per the Commission’s timeline for submission of written public comments prior to Board meetings.”

#### **4.6 ALTERNATIVE STATE MANAGEMENT REGIMES**

##### **4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option B. Restrict the Use of Conservation Equivalency Based on Stock Status**

- **I support Sub-option B1:** Restrictions: CE programs would not be approved when Sub-option B1-a: the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level. While I was hoping to see conservation

equivalency completely removed from the management process, that is not an option within Amendment 7. The TC has stated that the implementation of CE in the management process is unquantifiable and will likely cloud the regulations put in place by states to reach the overall reductions necessary. Option B, sub-option B1 provides the most limitations to the use of CE by states, some of whom have taken advantage of it. The stock needs to be managed for abundance and therefore I'd like to let the Commission know that CE has no place in a stock that is overfished with overfishing occurring. If you only choose to speak on or select a few options from A7, this should certainly be one of them.

#### **4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

- **I support Sub-option C3:** CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30. This is the most conservative option available as stated in Amendment 7 “NMFS warns that ‘[MRIP] Estimates should be viewed with increasing caution as PSEs increase beyond 30. Large PSEs—those above 50—indicate high variability around the estimate and therefore low precision.’”. I want to make sure the CE is only accessible if tightest estimate and least amount of risk.

#### **4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

- **I supports Sub-option D3:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 50%. An uncertainty buffer refers to the previously mentioned unquantifiable results of states putting CE in place as pointed out by the TC. What this means in simple terms is, if a state wants to make use of CE they will need to plan for a buffer to account for possible overages of F. In other words it could be thought of as a tax for using CE. This will hopefully discourage states from using CE in the first place. I would like to see the biggest buffer possible (50%) put in place to dissuade states from trying to use CE. If they do opt to use it the 50% buffer would hopefully counteract the potential overages in F.

#### **4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

- **I support Sub-option E2:** Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state-specific level. This would essentially undo the terribly unfortunate series of events that transpired during the addendum 6 process. New Jersey felt that the coastwide 18.5% reduction based on harvest was unfair as it translated to a larger reduction for them due to the complication of the slot limit. The board sided with New Jersey who then ultimately failed to meet its goals and in the end took no reduction. Therefore, I must select option E2.

**From:** [Ken](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass management comments  
**Date:** Wednesday, April 13, 2022 1:27:15 PM

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I think that our CT striper population is robust and healthy. I think that current regulations are helping the species. Keeping one bass, and the slot size of 28"- 35" is having a positive impact. I would remain status quo.

I think more enforcement is needed as always because poaching is a serious problem especially on the Housatonic River.

If the majority believes a more stringent solution is needed then I think the state should impose a closed season but allowing NO KILL catch & release. Where like in NYS anglers can target stripers during closed season, but not retain any fish. Closed Season can be imposed from December 15th until April 15th like NYS marine waters in the future.

Thank you.  
Sincerely,  
Ken Westerfeld  
347-740-9090

**From:** [Jack Reid](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 1:24:34 PM

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Re: Draft Amendment 7

Hello, as an avid angler of striped bass I am increasingly concerned about the approach to population management. The use of conservation equivalency should be minimized, restricted based on stock status, and should have a required uncertainty buffer.

Thank you for your consideration of my comments.

John

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**From:** [Joseph Diorio](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 1:14:12 PM

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Hello my name is Joe Diorio. I am a charter captain here in CT with Joe Diorio Guide Service. I mainly target striper and run a 100% catch and release striper charter. To give you a little background about me. I have been fishing the long island sound and specifically eastern long island sound and block island sound for the past 30+ years and chartering for the past 5. I am on the water everyday from the beginning of May to the middle of November.

Growing up I was very blessed to say I fished at the very height of the striper fisher. My father took me out every weekend and we caught more striper than I could count. From 1997 to 2016 I can honestly say was the height of our population. We caught striper everywhere and anywhere. Some of my favorite memories growing up were striper fishing with my father and his friends!

Ever since 2016 I have seen a steady decline of stripers and in 2019 it was the worst I've ever seen it. 2020 and 2021 while I did very well with my charters, I've never had to work so hard to find fish and stay on them. Areas that were loaded with bass pre 2016 are now completely void of them.

While I am happy to see concerns are being made of the health of the fishery. I feel like some of the changes being made are band-aids and we will continue to see this fishery fail.

My first concern is the slot limit. I know it has worked in the past for striper and for other species like redfish and snook, but our biggest population of fish are from 24 to 32 inches. With these limits we are killing off the largest population of fish. These could be the fish to save our fishery! Also at 28 inches these fish are getting to a mature age when they are able to spawn. This slot makes Zero sense to me since that is the major population of fish.

I personally would love to a tag system. Everyone who purchases a license is allowed 3 striper a season at 48+ inches or bigger. While I know our bigger fish are essential to our fishery and create the most and best eggs for recruitment. These bigger fish when they are caught they unfortunately don't release as well as the smaller fish. Especially when they are caught in deep waters or when they are trolled and dragged to the boat. The only way these fish actually have a chance is when they are handled with extreme care. In addition these fish have already spawned multiple times and have laid millions of eggs. Under the current regulations with the slot limit and with fisherman are not properly releasing/handling these larger fish we are essentially killing off both ends of the spectrum. the smaller fish from 28 to 34.999 and any fish that is too big to release. This is why it is important to onyl harvest the larger fish and at a low rate of harvest! Not to mentions the Chesapeake's and Hudson's 18 inch rule which is just ridiculous. Killing a fish before they have the opportunity to spawn is just horrible management and needs to be resolved immediately!

Charter boats are a major issue. There are boats running 2 to 3 trips a day. On a normal 6 pack boat that could be 18 fish a day. If the run 150 trips a year that's 2700 stripers a year just from that one boat. There are thousands of charter boats up and down the east coast. Charter boats should have a 1/3 boat limit. This means a boat with 6 people could take 2 fish per outing. This is more than enough meat for each person to feed themselves and their familys.

Especially if we institute a 48+ inch rule. This would cut down drastically the amount of stripers being kept!

Lastly commercial fishing needs to end. These fish are on the brink of extinction and we have states like Massachusetts who are trying to lengthen the Commercial season. This is not smart and not needed! Commercial fishing stripers just needs to end. There are plenty of fish that are more plentiful in the ocean to eat. For example sea bass. Limits should be raised on these fish. I see they actually putting more restrictions on these fish which is just ridiculous. Literally these sea bass are ruining our fisheries here. They eat anything and everything that comes in front of their face. Not to mention they are growing at rapid rates. We need to raise the limits on these fish before they do more damage than they already have. In turn instead of people killing more stripers they will be harvesting more sea bass which is much better eating anyways.

We really need to do everything we can to protect our stripers!

Thank you for your time. Please any question or concerns feel free to call or email me anytime. 860 214 3437 or [jdiorio21@gmail.com](mailto:jdiorio21@gmail.com)

Thanks!  
Joe

**From:** [Cody Wright](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7 - ASMFC Striper Management Public Comment  
**Date:** Wednesday, April 13, 2022 1:14:04 PM

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Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board (Board):

My name is Cody Wright, father of one (soon-to-be two), husband, golden retriever owner, resident-transplant of Massachusetts South Shore, and catch-and-release angler. I am writing to express my personal views and concerns regarding the current status of the striped bass population, management policies, and prospective management.

Personally, I have been a conservation-minded angler for most of my angling life; limiting my take, cleaning up rubbish from the banks and waters, and thinking twice about my impact on the resources. I found fishing as a hobby to divert myself from day-to-day stresses and anxiety-driven aspects of life; it is at this point that I found what I had been searching for: solace, purpose, and community. Angling has always been my elixir of stress and a way to disconnect, however simultaneously connect to the bounties of Earth's blessings. Even though I found this hobby myself, I have longed to share this resource with my son and to-be-born child in the next few weeks. It is with this concern that I have decided to pen my thoughts and speak my voice regarding this public comment. I thank you for the opportunity.

**Tier 1: Fishing Mortality (F) Triggers:** To me, management makes the most sense when science-based data is applied to the policy principles and adoption. With the target of longevity for both recreational and commercial anglers, I see it best to adjust management levels based on the mortality targets and spawning stock biomass targets; these should be considered as dependent variables when fluctuations occur. i.e. If mortality rates increase for two consecutive years and the spawning stock biomass falls below target in either year, then management must be amended to reduce the mortality rate overall.

**Tier 2: Spawning Stock Biomass (SSB) Triggers:** I believe this should be constantly managed as reportable data indicates that SSB falls below the threshold. Additionally, a rebuilding stock program should be implemented as this is a federal requirement via Magnuson-Stevens Act. Similar rebuilding programs in the Texas Gulf were implemented to rebuild the Red Drum fishery; one that I personally love and hold dear, too. Lastly, I believe this should be managed similarly to my comments in Tier 1 on a relationship basis with fishing mortality thresholds and biomass reproduction.

Please consider using science-based data and logic in all regards and use mortality-biomass reproduction as dependent variables. If SSB decreases below threshold indicating a poor breeding season, then mortality rates must be adjusted; this is not punitive to commercial, but should be seen as supportive to provide for longevity of keep.

**Efforts Controls (seasonal closures):** I view any two-week period of seasonal closures as a band-aid to a larger problem. Recreational angling is 90% catch-and-release, and this would be inappropriately punitive to the community. I would, however, support a two-week seasonal closure on catch-and-keep. This would allow for angling, but preserve stock. Additionally, law enforcement does what they can to police the regulations, however with their personal low resources, this is not an enforceable solution.

**Additional Gear Restrictions:** I support the prohibition of recreational anglers to not use lethal devices in an effort to pull the striper from the water or assist in releasing. Additionally, I would promote and support that nets must be of material that protects the fish (no rope, string nets).

#### **4.4 Rebuilding Plan**

##### **4.4.1 Recruitment Assumption for Rebuilding Calculation - Prefer option B**

##### **4.4.2 Rebuilding Plan Framework - Prefer option B**

**4.6.2 Management Program Equivalency** - I do not support Conservation Equivalency (CE) programs. I think this is an illogical way to support the longevity of the biomass for the benefit of both recreational and commercial anglers. I believe that it is fair and equitable for individual states to bear the proportionate burden when a reduction in mortality is necessary. This hopefully, will result in a future coastwide target.

Thank you for taking the time to read my commentary on the subject. I greatly appreciate the efforts you all are making, and I do hope that we can preserve the striped bass population for all through logic, science, and data in order to protect the striper population for generations to come.

All the best,  
Cody

--

Cody M. Wright, MBA

**From:** [Jerry Kustich](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 1:11:08 PM

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To Whom It May Concern:

In 2013 I retired from a 30 year career making bamboo fly rods for Winston Rods and then my own company Sweetgrass Rods located in Southwest Montana. For several reasons, I then decided to move to the Chesapeake Bay Area in northern Maryland where I now live a few miles from Susquehanna Flats. One of the reasons for choosing there was to spend my retirement years fishing for striped bass. Where I live in Charlestown, MD I not only continue to build rods for Sweetgrass Rods, but am only a few minutes away from what should be world class striper fishing. But ever since 2015 the decline of fish in these parts have been noticeable even to my novice eye.

During my years in Montana I was very active advocating for fish management and water resource issues. When I moved to Maryland I have been involved with Ocean Conservancy advocating for updating the Magnuson-Stevens Fishery Act. I also serve as a board member on the Gunpowder RiverKeeper Board, an organization dedicated to protecting the watershed that ultimately benefits striper reproduction along with providing a wonderful resource for the greater Baltimore area.

Since its inception, I have followed very closely the work and good intentions of American Saltwater Guides Association(ASGA) that addresses very positively the many aspects facing the restoration of an obviously declining striper fishery. At my age of 76 I don't even pretend to know all the intricacies of the problems, but I have read through ASGA preferred options for the Striped Bass Draft Amendment 7 and believe with all my heart that they are well thought out by those closely connected to the resource with the common good intention of restoring the fishery to a sustainable abundance that can be enjoyed by many well into the future. Though I likely will not be around then, I believe it is the role of old fisherman to leave behind a legacy. This is an opportunity for us all to do so.

Thank you for the opportunity to comment, and for your consideration.

Jerry Kustich  
Box 15  
405 Caroline St.  
Charlestown, MD 21914  
443.839.2054

**From:** [ben hung](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 12:56:22 PM

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Hi, I hope everyone is safe and well!

All facts are in, Stripe Bass are worth more alive than Dead!

I believe one keeper is fine. But everyone must have a license to fish and to keep. People must watch a video on safety and handling. Collect an amount of garbage from the beaches. And strong enforcement confiscating gear+fine. Commercial must have lower quotas which would result in higher prices. All hooks must be bar-less for Striper.

I hope my contribution helps!!

Best Regards  
Ben Hung

**From:** [Dylan Carney](#)  
**To:** [Comments](#)  
**Cc:** [Stripercomments@gmail.com](mailto:Stripercomments@gmail.com); [Dennis Abbott](#); [RITCHIE WHITE](#); [Cheri Patterson](#); [Renee Zobel](#); [Sen. David H. Watters](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 12:49:41 PM

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To whom it may concern,

My name is Dylan Carney, I'm 25 years old and grew up in Conway, NH. Over the past ten years I've fallen in love with saltwater fly fishing for striped bass. I bought my own 13 ft whaler at the age of 17, and have worked up to almost having my captains license.

Striped Bass are a crucial species to our atlantic shorelines and I know you are aware of that, but for my whole life I have only seen the fishing get harder and harder. I've heard the stories of the 90's and early 2000's and also the hardships of the 80's. Healthy waters make for healthy communities no matter where you are.

Thats why i'm emailing to say I support

#### **4.1 Management Triggers**

Tier 1 - Fishing Mortality Triggers

- Sub Option A-1
- Sub Option B- 1
- Sub Option C -1

Tier 2- Spawning Stock Biomass Triggers

- Sub Option B-2
- Sub Option B-1
- Sub Option C - 1

Tier 3 - Recruitment Triggers

- Sub Option A-2
- Sub Option B-2

Tier 4 - Deffered Management Plan

- Option A

#### **4.2.2 Measures to Address Recreational Release Mortality**

Option C. Additional Gear Restrictions

- Sub - Option C1
- Sub - Option C2

Option D. Outreach & Education

- Sub - Option D2

#### **4.4 Rebuilding Plan**

4.4.1

- Option B

4.4.2

- Option B

Thank you for your time

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Onward Together,  
Dylan Carney



**From:** [Todd Treonze](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 12:45:58 PM

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Todd Treonze  
69 1/2 Third Street  
Newport RI 02840  
Treonze@gmail.com

April 13, 2022

Emilie Franke  
FMP Coordinator  
1050 N. Highland St., Suite 200 A-N  
Arlington, Virginia 22201

Dear Members of the Atlantic Striped Bass Board,

I am a recreational angler based in Rhode Island and Connecticut and fish 12 months a year from shore, boat, and kayak. I live in a unique environment where I can target, catch, and release striped bass every month of the year. I would love to see others have the ability to experience fishing for stripers this way for years to come. I believe that striped bass should be managed for abundance, using the most conservative measures proposed to allow for us to see this species thrive for years to come. Consequently, my positions on the proposals within the Draft Amendment Seven are as follows:

- Fishing mortality management triggers
  - Timeline to reduce fishing mortality to the target:
    - I support option A-1 (status quo)
  - Fishing Mortality Threshold Triggers:
    - I support option B1 (status quo)
  - Fishing Mortality Target Triggers:
    - I support option C1 (status quo)
- Female spawning stock biomass management triggers
  - Deadline to initiate rebuilding
    - I support option A-2
  - SSB Threshold Triggers
    - I support option B-1 (status quo)
  - SSB target triggers
    - I support option C-1 (status quo)
- Recruitment triggers

- Recruitment trigger definition
  - I support option A-3
- Management Response to Recruitment Triggers
  - I support option B-2
- Deferred Management Action
  - I support option A (status quo)
- Fishing season closures
  - I support option B-1
- Gear restrictions
  - I support options C-1 and C-2
- Angler education
  - I support option D-2
- Recruitment Assumption for Rebuilding Calculation
  - I support option B
- Rebuilding Plan Framework
  - I support option B
- Management Program Equivalency
  - I support options B-1a and B-1c, B-2b, C-3, D-3, and E-2

I thank you for your work in managing striped bass and for the opportunity to provide feedback on the Draft Amendment Seven.

Sincerely,

Todd A. Treonze

**From:** [Stephan Botzki](#)  
**To:** [Comments](#)  
**Subject:** [External] KAF Comments on Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 12:44:31 PM

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Dear Ms. Franke,

Hi,

Commercial and recreational fishermen need to have the same slot sizes to protect the big female fish with the genetics we want to preserve .

Fishing with more than a single hook, or one treble hook needs to be forbidden. Recreational and commercial anglers need to get more educational collateral for proper catch and release techniques along with their license purchase. Salt water licenses are too cheap at \$10 for full year in Mass. The price should be doubled or trippled and the money spent on more patrolling officers against poaching.

Fines for poaching needs to be increased, at least doubled and all gear must be confiscated.

Extra money from licenses and poaching fines also needs to be spent on protecting bait fish and especially spawning grounds of striped bass.

Kind regards

Sincerely,

Stephan Botzki  
583 Park St Apt Attleboro  
Attleboro, MA 02703  
[stephanbotzki@gmail.com](mailto:stephanbotzki@gmail.com)

From: [Drew Contessa](#)  
To: [Comments](#)  
Cc: [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
Subject: [External] Draft Amendment 7  
Date: Wednesday, April 13, 2022 12:27:10 PM

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ASMFC,

I'm writing to you today to offer my comments regarding Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass. I am a passionate advocate of striped bass conservation and I am a recent father of two children. I want them to grow up in a country that takes care of one of its most valuable resources.

It is vital that the board no longer delays action on management triggers. The triggers are generally acceptable where they're currently positioned. Wherein the problem lies is the board's inaction when triggers are tripped. As it pertains specifically to fishing mortality, that factor should be reduced to target level or sub target level within one year. There is simply no evidence to support continuing to kick the can down the road. The same rationale applies to threshold and target triggers - the current parameters should be left in place. It is, however, time to update the recruitment trigger (sub-option A2). It seems as though this option is the path of least resistance for managers while still remaining cognizant of poor recruitment years/periods. The key is being responsive to the above mentioned periods of weak matriculation by reducing mortality when they do occur. The perennial trend of exploiting strong year classes and ignoring poor ones needs to end here and now.

As far as the implementation of a rebuilding plan is concerned the two year deadline is acceptable so long as it's adhered to. Needless to say, recreational release mortality, much like striped bass management in general, is a dense, complex and multifaceted issue. But one thing is very clear - the majority of anglers coast wide that target striped bass do so on a catch and release basis. Targeting closures, although theoretically sound, are veritably impossible to regulate, difficult to enforce, essentially unquantifiable, and are simply not the answer so long as cohabitation with other species occurs. The best way to address the release mortality issue is by adopting a game-plan that would prohibit recreational anglers from using lethal devices to remove or assist in the removal of striped bass (sub-option C1). The fact that we're even still discussing gaffing bass is frankly distressing and disheartening. Finally, closing the circle hook loop-hole and requiring striped bass that are caught as bycatch with non circle hooks by anglers "targeting" other species to be released (sub-option C2), although again hard to enforce and regulate, is a step in the right direction and should be adopted immediately.

Regarding outreach and education we must collectively strive to promote best handling practices (perhaps including those included in sub-option D1) via public education and outreach campaigns. Don't underestimate the importance of this; a little goes a long way with this kind of stuff! The return on what little investment it takes for states (and municipalities and private organizations) to make educational materials available through tackle shops, guides, fishing license packets and alike

could have a significant impact.

Conservation Equivalency is the single most important issue in Amendment 7; it has also likely been the biggest hurdle to striped bass abundance in the time period since the end of the moratorium. Conservation Equivalency frankly flies in the face of the spirit of interstate management for a migratory species in general as it allows individual states to essentially set their own regulations. Perhaps never in the history of fisheries management has a tool been so abused. There are several paths the board could take regarding Conservation Equivalency. Personally I would advocate its wholesale elimination but in the absence of total disbandment you must curtail its implementation when the stock is overfished. Lastly, as I'm sure you now realize, the state to state distribution of the reductions in Amendment 6 were hugely problematic. Going forward reductions must be tiered and distributed on a state by state basis predicated on removals.

Thank you for your consideration,

Best,

Drew Contessa

**From:** [Tom Moriarty](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 12:14:37 PM

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Hello,

To whom it may concern, I would like to provide feedback on Draft Amendment 7, to ensure that the Striped Bass population can be something the my future children and family generations can enjoy in the ways that I have been able to in my life.

I truly believe, if the appropriate action is not taken immediately - we risk another moratorium or worse... which would be embarrassing to see given the lessons we should have learned from in the past.

Please find my perspectives below on the area's up for discussion:

Section 4.1 - Tier 1 - I support the status quo options for Options A, B, and C.  
Section 4.1 - Tier 2 - Option A - I support Sub Option A2, Option B - I support sub option B1, Option C - I support sub option C1  
Section 4.1 - Tier 3 - Option A - I support Sub Option A2, Option B - I support sub option B2,  
Section 4.1 - Tier 4 - Option A - I support Sub Option A  
Section 4.2.2 - Option C - I support Sub Option C1 and C2  
Section 4.2.2 - Option D - I support Sub Option D2  
Section 4.4.1 - I support Option B  
Section 4.4.2 - I support Option B  
Section 4.6.2 - Option B - I support sub option b1-a  
Section 4.6.2 - Option C - I support sub option C3  
Section 4.6.2 - Option D - I support sub option D2  
Section 4.6.2 - Option E - I support sub option E2

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Thank you,

Tom Moriarty

[tmoriarty514@gmail.com](mailto:tmoriarty514@gmail.com) E

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**From:** [Tyler Nonn](#)  
**To:** [Comments](#)  
**Subject:** [External] Hello. Amendment 7 comment  
**Date:** Wednesday, April 13, 2022 12:11:22 PM

---

Hello,

As a life long angler and owner of multi boat charter operation in the Chesapeake bay. I endorse Amendment 7 and we desperately wish to manage striped bass for abundance. These fish need help. I spend thousands of days on the water and we need more fish for a successful fishery and economic growth/success in the bay.

Thank you,  
Tyler Nonn  
Tidewater Charters  
443-553-0277

**From:** [wahooslayer89@comcast.net](mailto:wahooslayer89@comcast.net)  
**To:** [Comments](#)  
**Subject:** [External] Comments - Striped Bass Amendment 7  
**Date:** Wednesday, April 13, 2022 12:10:39 PM

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Hello ASMFC,

My name is Stephen Richter from New Jersey. Regarding public comments on Amendment Seven for the management of striped bass, please read the following:

For many of us, excluding our immediate families from the following, there is quite possibly nothing greater in life for which we sincerely care about; the issues we face regarding the future of striped bass, Amendment Seven and what it truly means for this species future. First re-building the population while doing everything as humanly possible to ensure we remain at high population numbers. Abundance. Priority number one. Every decision should be made for the striped bass, first and foremost.

Below are my choices for each proposed regulation:

4.1

Tier 1

A1

B1

C1

Tier 2

A2

B1

C1

Tier 3

A2

B2

Tier 4

A

4.2

B2-b

C1, C2

D2

4.4.1

B



4.4.2

B

4.6.2

B1-a

C3

D2

E2

I would also like to add a few comments, please.

1) CE - Conservation Equivalency. This is not helping the striped bass at any measure. Whatever it takes, at all costs, I wish this to be removed from the system. This in my humble opinion, seems to be a major roadblock ensuring the striped bass will NOT recover quickly. Sounds good in theory. Feels and tastes bad in action.

2) I personally believe the striped bass reacts better to type parameter regulations. Not instance based parameters on a state by state or jurisdiction basis. I think we are failing at this level. Non-migratory species can be managed at the project level. Migratory species are managed on a program level. The striped bass should be managed from North Carolina to Maine... as one. Collective regulations and bag limits. Ocean, bay or river. In example, in short: No differentiating set of regulations across regions. I am allowed to keep one striped bass per day at 28" to less than 35" in Rhode Island. It should be the same in Maryland, Virginia or New York. Anywhere I could possibly hook and catch a striped bass.

3) If you do not protect ANYTHING in life at young age, it will not grow to mature age. We need to protect spawning areas better in order to help ensure success along with reducing the take of young immature fish!

"I will return where I came from. If you please just grant me opportunity to first grow up."

- The Striped Bass

At the end of the day. Please stand up for the striped bass. Whatever it takes. Put an end to overfishing as quickly as possible. Please manage stripers for abundance, and not yield!

Best Regards,

- Stephen Richter

**From:** [Jim Simms](#)  
**To:** [Comments](#)  
**Cc:** [Ken Mcrae](#); [Dave Bixby](#); [John Kaufmann](#); [Garry Aho](#)  
**Subject:** [External] Amendment 7  
**Date:** Wednesday, April 13, 2022 12:04:32 PM

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I applaud the Commission for drafting Amendment 7 to address the overfished condition for striped bass. I spend four months a year on Cape Cod fishing almost daily for them, and have witnessed a steady decline since 2015.

Please accept the following comments when making your final decision on Amendment 7:

**Management Triggers.** I support the triggers established in the amendment. Once a trigger is tripped, the Management Board must react immediately. Previous inaction has exacerbated the current overfished situation.

**Recreational Release Mortality.** Since 90 percent of the fishery is catch & release, educating the public on proper release procedures should assist in reducing the supposed 9 percent release mortality. This, coupled with the use of circle hooks for bait and prohibition of gaffs should ameliorate mortality.

**Rebuilding Plan.** The spawning stock biomass (SSB) must be rebuilt to target by 2029. With low recruitment occurring in the Chesapeake Bay, the Management Board must reduce removals if the plan has less than a 50 percent chance of success.

**Conservation Equivalency.** This is one of the leading causes of the troubled state of striped bass. Until the SSB is above the threshold, this approach should definitely be a non-starter.

Thank you for the opportunity to provide comments on the Amendment.

Jim Simms

**From:** [john jancuk](#)  
**To:** [Comments](#)  
**Subject:** [External] Please help save the rock fish  
**Date:** Wednesday, April 13, 2022 11:52:42 AM

---

Hello,  
Please help to save the rock fish.  
Thank you

Sent from my iPhone

**From:** [Stefan Zaklin](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Regulations  
**Date:** Wednesday, April 13, 2022 11:50:06 AM

---

Dear ASMFC,

I am writing with regard to striped bass regulations, particularly in the Chesapeake Bay. There are a number of points of concern I would like to share with you:

- The demonization of catch and release is unfounded and scientifically proven to be an essential practice in preserving fisheries. While proper technique is important, a greater factor in whether fish can survive being caught and released is how the fish was caught in the first place. Live-liners frequently find that they have gut-hooked a striped bass, and so catching and then releasing a mortally wounded fish of course results in a death. I exclusively fish with light tackle and artificial lures, using jigging or top water techniques. I have never seen a fish caught with this method hooked anywhere other than in the mouth, and it is easy and fast to effectively remove the hook and release the fish with minimal stress. To summarize, catch and release is not the cause of increased mortality in striped bass, and live lining is much more dangerous.
- There are fisheries in other parts of the world that protect their game species by specifically requiring catch and release only. I doubt they would do this if they thought it would destroy the fishery.
- There are fisheries in other parts of the world that protect their game species by specifically requiring the use of artificial lures only. This would do significantly more to reduce the mortality of catch and release than anything else.
- I know some people still want to keep a fish to eat. I think allowing a limit of one fish between 19-24 (or so) inches would preserve the hardest breeders, preserve the young fish, and still meet the sporting desire to eat what you catch.
- The striped bass population in the Chesapeake Bay is at risk, but it is not due to catch and release fishermen using artificial lures. To really address the health of the fishery, more attention should be paid to the commercial overfishing of menhaden, to live-lining and bait tactics, to permitting people to keep breeding fish, and to limits that allow more fish to be kept than necessary.

Thank you for your time and consideration.

Stefan Zaklin  
Chester, Maryland

--

Stefan Zaklin  
202-210-0366

**From:** [Durbin Wells](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Wednesday, April 13, 2022 11:34:00 AM

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To those who question the need (long past due) to take meaningful steps to assure the future of this fishery:

What don't you understand??? All indications are that in the near future, without aggressive and consistent management practices (and enforcement) across the board, we will have nothing but regret to show for a lack of decisive action today! If we act now, we may be able to continue to enjoy the sport we love, as well as assure that our kids and their kids will be able to experience the joy that fishing has provided us for years. If we don't act responsibly today, all that may be left for them are photos ... and video games!!

Bringing logic and rational thinking to the table, I believe the approach proposed by The American Saltwater Guides Association makes the most sense at this stage ... and I fully endorse their positions.

Sincerely,

Durbin Wells  
[durbinwells@verizon.net](mailto:durbinwells@verizon.net)

**From:** [Karl Jacobson](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Wednesday, April 13, 2022 11:33:03 AM

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ASMFC Board,

I have been very disappointed in the management of Striped Bass since the mid 2000's. The sacrifices that recreational fishermen have made over the years to replenish stocks have been abused by the commercial fishing lobby. It is obvious to me the only way to keep Striped bass a viable fishery is to make it a game fish as has been done in New Hampshire and Maine. Striped Bass have much more value as a game fish than on someone's restaurant menu. New Hampshire fish and game recommends only eating striped bass once a month and pregnant women not at all, why is that? Because it cannot be consumed on a regular basis safely.

That being said, I would like to add my comments to Amendment 7:

Management Triggers:

Tier 1 : Option A-1 , B1 and C-1

Tier 2 : Option A-2 , B-1 and C-1

Tier 3: Option A-3 and B-2

Tier 4 : Option A

Recreational Fishery Management Closures:

Option B : B-2 and B2-b

Option C : C-1 and C-2

Option D : D-1

Rebuilding Plan:

4.4.1 - Option B

4.4.2 - Option B

Alternate State Management:

Option B: B-1

Option C: C-3

Option D: D-3

Option E: E-2

Thank you for your time,

Karl Jacobson  
11 Ina Ave.  
Hampton, NH 03842

When writing or responding, please remember that the Secretary of State's Office has determined that email is a public record



**From:** [Shawn C.](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped bass  
**Date:** Wednesday, April 13, 2022 11:26:41 AM

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I have fished for striped bass in the Maryland waters of the Chesapeake Bay for several years. Early on, I fished with live bait and chunk bait but due to the many guy hooks (with circle hooks), I now only use artificial lures and catch and release. I strongly urge you to make better decisions which include eliminating live lining and chunk bait but allowing catch and release. We need to protect these fish and the numbers clearly indicate that what we are doing now is not working.

Kind regards,

Shawn Cavanagh

From: [Graham Stephens](#)  
To: [Comments](#)  
Subject: [External] 2022 Comment Letter  
Date: Wednesday, April 13, 2022 11:26:07 AM

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Dear Sir or Madam,

My name is Graham Stephens, and I am an avid shore and boat fisherman from Massachusetts. Recreational saltwater fishing for striped bass is the activity I most look forward to participating in with friends and family during the year. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

B-None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

I primarily fish the greater Boston Harbor area, both by boat and from shore. Over the past five seasons, I have observed a further decline in the already depleted striped bass fishery. There are almost no slot-sized bass and fewer larger bass, and the bass that are around can longer be found in much of the harbor - places where they could regularly be found not many seasons ago.

Last season, the fishery for large striped bass in Boston's outer harbor never materialized in the manner it had over prior seasons. In addition, quite surprisingly, over much of the summer, Boston's inner harbor lacked smaller, school size bass – a day on the flats with light tackle might not produce fish.

I understand the primary question on which the Commission is seeking public comment is “How would you like the management of the Atlantic striped bass fishery to look in the future?” I believe that the Commission needs to act quickly to adopt the most conservative measures designed to protect our beloved striped bass, and that the striped bass stocks should be managed for abundance.

In addition to the Commission's important work to reduce mortality from recreational fishing, I would also like to comment that I am quite concerned about the toll that commercial fishing for striped bass in Massachusetts is taking on the stocks. Adjustments were made to the MA commercial striped bass fishing rules for 2021, including to allow three consecutive days of commercial fishing. As a result of these changes, the annual commercial striped bass quota was filled in MA – 735,240 pounds of fish. If you estimate an average weight of 30lbs per commercial fish, this means MA commercial fishermen removed almost 25,000 striped bass from the breeding stocks last summer! This seems like the wrong approach to take with an overfished species such as striped bass. How do we allow commercial boats to sit and obliterate large bass on bunker schools in Boston Harbor? We might as well be out hunting the last of the buffalo. I personally would like to call a halt to all commercial and recreational harvest of striped bass in order to give the stocks time to recover.

Our Massachusetts and Atlantic Coast communities simply cannot afford to lose the economic benefits of recreational striped bass fishing. If we continue to mismanage the bass today, the bass will be gone - then there will be no fishing shows, no more fishing trips/charters, no more spending on fishing boats, gear and media content. No more striped bass to catch means no more spending.

I appreciate the Commission's efforts to identify the major issues and alternatives relative to the management of the striped bass. I urge you to immediately adopt every alternative possible to quickly reduce striped bass mortality.

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Graham Stephens  
Cohasset, Massachusetts

Email: [gccstephens@gmail.com](mailto:gccstephens@gmail.com)

**From:** [kfrei10](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] My Thoughts on Amendment 7 - To Save the Stripe Bass population.  
**Date:** Wednesday, April 13, 2022 11:23:12 AM

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Dear Commission,

I am writing to you with my strong opinion on what needs to be done with Amendment 7. Striped bass have been severely overfished and action must be taken now to save them. We need to do everything we can to help save these fish before it is too late. The previous lack of effort and accountability by the ASMFC is absolutely appalling. Year after year, these issues at hand continue to get worse with little to no actions being taken.

I support the following options.

**Tier 1**

Option A- Support A1  
Option B- Support B1  
Option C- Support C1

**Tier 2**

Option A- Support A2  
  
Option C- Support C1

**Tier 3**

Option A- Support A2  
Option B- Support B2

**Tier 4**

Support A

**4.2**

Option B- Support no measures  
Option C- Support c1, c2  
Support D- Support D2

**4.4.1**

Support B

**4.4.2**

Support B

**4.6.2**

Option B- support B1-a  
Option C- support c3  
Option D- Support D2

Option E- Support E2

I appreciate the opportunity to voice my opinion.

Thank you,  
Kyle Freiman

**From:** [Steve Morgan](#)  
**To:** [Comments](#)  
**Subject:** [External] Protect the Striped Bass!  
**Date:** Wednesday, April 13, 2022 11:22:25 AM

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Good Morning,

I am emailing to express my thoughts/comments on the state of the striped bass fishery in Maryland. I fish the Chesapeake bay regularly and generally go with local guide's who know the water, fishing techniques, etc. I want to echo the comments of one of those guides – who has grown up on the water here and has decades of experience and local knowledge. His message is copied below.

To be direct, we need to protect the breeders. We need to stop the over harvesting of menhaden. We need a 1 fish per person limit for everyone – including charters. We need to encourage and promote catch and release, with artificial baits. We need to look at how other species have come back – i.e. the Red Drum. And we need to act immediately.

Comments from Captain Jamie Clough:

Good afternoon..having fished the bay for over 45 years its heart breaking to see what is happening to striped bass..

I have a few areas that concern me..

1) From my states perspective(Maryland)

They seem to be demonizing catch and release..I am a light tackle guide who is probably close to 80% catch and release..

Limiting the days we can fish seriously hurts my guide business..

Education of proper catch and release is one of the most important things I teach on my charters..

One of the main differences in catch and release here is I use artificial baits..minimal harm to the fish..

Bait and live lining by far do the most damage to stripers for catch and

I dont do either..

I would love to see a 1 person limit on striped bass for all..including charters..

If we all have to give something to progress the population then I am all for it..

I really have a serious problem with having a closure (April and 2 wks in July) and still harvesting too many fish..

There are other species to target in other waters which are 2-3 hours from my home port..

I also take in consideration the fantastic comeback of the Red drum

They protect the breeders...simple math dont kill the breeders...they will come back

Thank You

Capt Jamie Clough

Eastern Shore Light Tackle Charters

4437865266



**Steve Morgan**

President

[c] 443-336-6527

[smorgan@peake.com](mailto:smorgan@peake.com)

[www.peake.com](http://www.peake.com)

[www.tacticalip.com](http://www.tacticalip.com)

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**From:** [Paul Sibiga](#)  
**To:** [Comments; stripercomments@gmail.com](#)  
**Subject:** [External] Amendment 7  
**Date:** Wednesday, April 13, 2022 11:17:09 AM

---

Good Morning ASMFC –

My name is Paul Sibiga, I am an avid surfcaster originally from Connecticut and currently living in Rhode Island. Striped Bass and their conservation is very important to me. I began surfcasting in 2009 after years of freshwater trout and largemouth bass fishing. The first few years were great. Striped Bass seemed to be everywhere, and I absolutely loved the challenge of learning new spots throughout the CT/RI coastline and being rewarded for my efforts by catching bass throughout most nights when I went out. As the years went on and my fishing knowledge grew, one would expect there to be not only more fish, but also bigger fish to be found and caught. That was not the case, as time passed and my knowledge grew, I slowly but surely came to catch fewer and fewer bass each season. Spots that consistently held big fish still held them, however, every year there seems to be fewer and fewer of them to catch. The challenge of finding them is an adventure in and of itself, however, spending an entire tide in the surf and not even getting a bump from a fish can be discouraging to say the least.

It is frustrating to me to read about the stocks collapsing in the 1980s and then reading articles written in the 1990s and early 2000s about the lessons “learned” from that collapse and how to prevent future collapses. It is frustrating to me because it seems like nothing was learned from the first collapse. Or, if anything was learned, who is responsible for the collapse that is currently occurring? Looking at the Striped Bass YOY index, it appears to me that the last 3 years were well below average. Shouldn’t this warrant some serious action to do all we can to conserve the species? In 2019 the ASMFC determined that Striped Bass were experiencing overfishing and put forth stricter regulations to try to manage that. They are not working.

Ideally, I would love to see Striped Bass attain gamefish status and become a catch and release only fishery coastwide. I recognize that is not currently an attainable goal. Therefore, I have read the Draft Amendment 7 that is on the ASMFC website and have drawn several conclusions with which I agree with and would love to see implemented.

I support the following –

**Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

**Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

**Tier 3**

Option A- Support A2

Option B- Support B2

#### **Tier 4**

Support A

#### **4.2**

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D2

#### **4.4.1**

Support B

#### **4.4.2**

Support B

#### **4.6.2**

Option B- Support B1-a

Option C- Support C3

Option D- Support D2

Option E- Support E2

Thank you for taking the time to allow the public to comment on this matter. I am hopeful that thousands of other letters similar to mine will help push the board and committee to do the right thing. We want there to be a healthy fishery for generations to come.

Please protect Striped Bass.

Thank you for your time – Paul Sibiga

**From:** [Michael Billings](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Conservation  
**Date:** Wednesday, April 13, 2022 11:16:18 AM

---

To whom it may concern:

A public resource that is beloved by millions up and down the east coast is in trouble. I have seen the rise and fall of this population in my lifetime. Please take action to manage this resource not to maximize harvest but to ensure my children can share in the same or better memories. Now is the time. Sacrifice on all sides is needed. Thank you.

Michael Billings

Sent from my iPhone

From: [Chase F](#)  
To: [Comments](#)  
Cc: [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
Subject: [External] Draft Amendment 7  
Date: Wednesday, April 13, 2022 11:13:46 AM

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Dear Commission,

I am writing to you with my opinion on what needs to be done with Amendment 7. Striped bass have been overfished and we must act now. It is important that we do everything we can to save these fish before it is too late. The lack of effort and accountability with the ASMFC is outstanding. These fish have been overfished for years yet there has been no plan put in place to save these fish.

I support the following options.

**Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

**Tier 2**

Option A- Support A2

Option C- Support C1

**Tier 3**

Option A- Support A2

Option B- Support B2

**Tier 4**

Support A

**4.2**

Option B- Support no measures

Option C- Support c1, c2

Support D- Support D2

**4.4.1**

Support B

**4.4.2**

Support B

**4.6.2**

Option B- support B1-a

Option C- support c3

Option D- Support D2

Option E- Support E2

I appreciate the opportunity to voice my opinion.  
Thank you  
-Chase

**From:** [gryphon richardson](#)  
**To:** [Comments](#)  
**Subject:** [External] stripercomments@gmail.com  
**Date:** Wednesday, April 13, 2022 10:51:48 AM

---

Hello,

One of my most cherished memories and still my favorite activity to this day is fishing for Striped Bass in the Long Island Sound with my Family. I strongly urge the committee to defend and enable as much restoration for the species as possible!

Thank you in advance,

Gryphon Richardson  
203-554-5852

**From:** [Robert Rifchin](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 10:33:22 AM

---

To the ASMSC:

I moved to Cape Cod 6 years ago as the culmination of 20 years of planning for a retirement where I could enjoy a life where I could fish for striped bass the rest of my days. I had hope that the professional managers involved with the species would help them survive and prosper. To date the efforts expended are far short of what is needed for the species, and Draft Amendment 7 is the best effort to date to help ... I hope you will help the fish and not the interests that see them as income even if that means I can no longer angle for them. They and the species that they depend on are far too important to the health of our ocean to play with weak and ineffective measures any longer.

Robert Rifchin

19 Carriage Lane

Barnstable, Massachusetts 02630

Sent from my iPad

**From:** [Chris Anderson](#)  
**To:** [Comments; stripercomments@gmail.com](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 13, 2022 10:03:14 AM

---

Good Morning,

My name is Christopher Anderson, I am a resident of New Jersey and an avid surfcaster that wants to see the best interests taken for the management and conservation of the Atlantic Striped Bass given the current state the fishery is in. Seeing as the stock is currently overfished and the last several years of low recruitment numbers, the right decisions need to be made, and action taken now to restore this invaluable resource we care so much about.

I do not support any no target closures as it is an unenforceable measure that will cause economic hardship for those vested in the recreational fishing industry.

I would like to see Conservation Equivalency done away with. This is a coastwise fishery of a migratory species that we all share and should all have the same vested interests,

Regarding Outreach and Education, I think what would drastically change the release mortality numbers would be some sort of angler education course that would be required to complete before being issued a fishing license.

My father introduced me to fishing for striped bass in the late 90's when I was around 10 years old. I am a father now and I would like to be able to have my son be able to experience some of the great fishing that I did as a child.

We must think of the next generation of anglers and build for them a great fishery that they can enjoy and develop a passion for much like many of us have.

Please see below what options I support.

Respectfully,  
Christopher Anderson  
119 Beverly Blvd, Brick Township, NJ 08724

#### **4.1 Management Triggers**

Tier 1: Fishing Mortality (F) Triggers

##### **Option A: Timeline to Reduce F to the Target**

**Support Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year.

##### **Option B: F Threshold Triggers**

**Support Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.



### **Option C: F Target Triggers**

**Support Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

Tier 2: Spawning Stock Biomass (SSB) Triggers

### **Option A: Deadline to Implement a Rebuilding Plan**

**Support Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

### **Option B: SSB Threshold Trigger**

**Support Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

### **Option C: SSB Target Trigger**

**Support Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

Tier 3: Recruitment Triggers

### **Option A: Recruitment Trigger Definition**

**Support Sub-option A2:** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

### **Option B: Management Response to Recruitment Trigger**

**Support Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

Tier 4: Deferred Management Action

**Support Option A (status quo): No Deferred Management Action.**

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

#### **4.2.2 Measures to Address Recreational Release Mortality**

##### **Option C. Additional Gear Restrictions**

**Support Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**Support Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

##### **Option D. Outreach and Education**

**Support Sub-option D2:** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

#### **4.4 Rebuilding Plan**

##### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

**Support Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

##### **4.4.2 Rebuilding Plan Framework**

**Support Option B:** 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 recruitment assumption specified in Amendment 7) 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.

##### **4.6.2 Management Program Equivalency (Conservation Equivalency)**

##### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

**Supports Sub-option B1-a:** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

**Support Sub-option C3:** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

**Support Sub-option D2:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

### **Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

**Support Sub-option E2:** the percent reduction/liberalization projected for the FMP standard at the state-specific level.

**From:** [Patrick Rudman](#)  
**To:** [Comments](#)  
**Cc:** [Patrick Keliher](#); [Rep. JAY MCCREIGHT](#); [Sen. Dave Miramant](#); [Stephen Train](#); [Megan Ware](#); [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [patrick@oldmaineoutfitters.com](mailto:patrick@oldmaineoutfitters.com)  
**Subject:** [External] Amendment 7  
**Date:** Wednesday, April 13, 2022 9:54:38 AM

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Hello,

My name is Patrick Rudman. I am an avid striped bass fisherman in Maine and owner of Old Maine Outfitters. I would like to thank you all for the opportunity to provide my comments on Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass.

The decline in striped bass over the last decade + has been very troubling to witness. In Maine, we aren't fortunate enough to have multiple options when it comes to targeting species in our Maine coastal waters, and as you know, Striped bass makes up the vast majority of anglers' pursuits. And while the same is true in a lot of states, this is why it is so unbelievably critical we take the appropriate measures to restore this iconic species to its former greatness. This way people will continue to visit our states for fishing, continue to shop our tackle shops and continue to connect to the outdoors. We have an opportunity here to do what is truly right for this fishery, please don't waste it.

Lastly - a note for my Maine Board members. I would like to see Maine be the leader once again and go above and beyond here. Make striped bass a game fish in Maine. Implement a tagging system in Maine. Ban double treble hooks in Maine, etc etc. Maine anglers are eager for these changes and if Maine steps up, other states will follow.

In regards to Draft Amendment 7, below are the following options I support.

- **4.1 Management Triggers**

- **Tier 1: Fishing Mortality (F) Triggers**
  - **Option A: Timeline to Reduce F to the Target**
    - **I support Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year.
  - **Option B: F Threshold Triggers**
    - **I support Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.
  - **Option C: F Target Triggers**
    - **I support Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.
- **Tier 2: Spawning Stock Biomass (SSB) Triggers**
  - **Option A: Deadline to Implement a Rebuilding Plan**
    - **I support Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

- **Option B: SSB Threshold Trigger**
          - **I support Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].
        - **Option C: SSB Target Trigger**
          - **I support Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].
  - **Tier 3: Recruitment Triggers**
    - **Option A: Recruitment Trigger Definition**
      - **I support Sub-option A2:** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)11 shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.
    - **Option B: Management Response to Recruitment Trigger**
      - **I support Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.
  - **Tier 4: Deferred Management Action**
    - **I support Option A (status quo): No Deferred Management Action.** If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.
- **4.2.2 Measures to Address Recreational Release Mortality**
  - **Option B: Effort Controls (Seasonal Closures)**
    - **I do not support any opens outlined in Option B.** There is not enough specific information outlined in this option. Additionally, the data is not there to show that this would have an impact, particularly in Maine where our shorter season, cooler water temperatures, and overall better water conditions are more conducive to the survival of striped bass post-release.
  - **Option C: Additional Gear Restrictions**
    - **I support Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.
    - **I support Sub-option C2:** Striped bass caught on any unapproved method of taking would be returned to the water immediately without unnecessary injury.

*While this is not included in the Amendment - I would like to see Maine be the proactive leaders once again and consider banning two or more treble hooks on artificial lures.*

- **Option D: Outreach and Education**
  - **I support Sub-option D2:** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.
  - *There is an opportunity here again for Maine to be the leader, and consider requiring fishing license holders to complete an online quiz prior to issuing the license.*
  
- **4.4 Rebuilding Plan**
  - **4.4.1 Recruitment Assumption for Rebuilding Calculation**
    - **I Support Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.
  - **4.4.2 Rebuilding Plan Framework**
    - **I support Option B:** 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 recruitment assumption specified in Amendment 7) 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.
  
- **4.6.2 Management Program Equivalency (Conservation Equivalency)**
  - **Option B: Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**
    - **I support Sub-option B1-a:** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.
    - *We must get rid of CE programs if the stock is below the biomass threshold. The data is simply not there and we have seen time and time again these CE programs intentionally abuse the system. Please put an end to these programs when the stock is in trouble.*
  - **Option C: Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**
    - **I support Sub-option C3:** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.
  - **Option D: Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**
    - **I support Sub-option D2:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

- **Option E:** Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries
  - **I support Sub-option E2:** the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Thank you for your time,

Patrick Rudman  
26 Bellevue Ave,  
South Portland ME, 04101  
207-831-2617

**From:** [johnny Feeney](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Wednesday, April 13, 2022 9:45:02 AM

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To the commission

Regarding proposed striped bass Amendment 7.

I am an recreational fisherman who cares allot for our striped bass fishery. Hopefully I have put my specific comments to the individual questions/tiers related to Amendment 7 in a list at the end

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- The ASMFC needs to act fast do not delay or we will lose this fishery forever.
- Please, focus on managing the striped bass for abundance and not for yield when making your decisions. Note that the striped bass fishery has a big recreational, catch and release, fishery - it is important focus is put on increasing the fish's population

I do not support 4.2, tier B. However, I would be in support of closures if these concerns could be addressed, and would even support stricter and/or longer closures if it ultimately leads to abundance.

We must rebuild this fishery ASAP and at all costs, and that requires immediate and aggressive action from the commission.

I support an immediate Addendum to eliminate the harvest of striped bass.

Thank You

John Feeney, Dennisport , Ma, 02639

4.1

Tier 1

Option A- Support A1

Option B- Support B1

Option C- Support C1

Tier 2

Option A- Support A2

Option B- Support B1

Option C- Support C1

Tier 3

Option A- Support A3

Option B- Support B2

Tier 4

Support A

4.2



Option B- Support no measure  
Option C- Support C1, C2  
Option D- Support D1

4.4.1  
Support B

4.4.2  
Support B

4.6.2  
Option B- Support B1-a  
Option C- Support C3  
Option D- Support D3  
Option E- Support E3

Sent from my iPhone

**From:** [Jay Sullivan](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 - Comments  
**Date:** Wednesday, April 13, 2022 8:22:14 AM

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To the ASMFC,

As a recreational fisherman, these are my comments regarding Amendment 7 for Striped Bass:

#### **4.1 Management Triggers**

##### Tier 1:

Option A - I support **Sub-Option A1** (status quo).

Option B - I support **Sub-Option B1** (status quo).

Option C - I support **Sub-Option C1** (status quo).

##### Tier 2:

Option A - I support **Sub-Option A2** (Two year deadline to implement rebuilding plan).

Option B - I support **Sub-Option B1** (status quo).

Option C - I support **Sub-Option C1**.

##### Tier 3:

Option A - I support **Sub-Option A2**.

Option B - I support **Sub-Option B2**.

##### Tier 4:

Option A - I support **Option A** (status quo, No deferred management action).

#### **4.2.2 Measures to Address Release Mortality**

Option C - I support **Sub-Option C1** and **Sub-Option C2**

Option D - I support **Sub-Option D2**

#### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

Option B - I support **Option B**. Rebuild female SSB no later than 2029.

#### **4.4.2 Rebuilding Plan Framework**

Option B - I support **Option B**

#### **4.6.2 Management Program Equivalency**

Option B - I support **Sub-Option B1-a** (CE programs should not be approved when the stock is at or below biomass threshold)

Option C - I support **Sub-Option C3**

Option D - I support **Sub-Option D2**  
Option E - I support **Sub-Option E2**

Best,

James R Sullivan  
9 Ludlam Ln  
Locust Valley, NY 11560

**From:** [Paul Aldrich](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass commets, Amendment 7 and beyond  
**Date:** Wednesday, April 13, 2022 7:46:36 AM

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Hi Emilie,

My name is Paul Aldrich. I'm a recreational fisherman in Massachusetts. This is an excellent proposal, but I don't think it does enough. A few more enhancements I would like to offer to **further protect** striped bass

1. Ban treble hooks, and mandate that all artificial lures use single hooks only. Explanation: Swapping out hooks is a simple task for 99% of fishermen. Trying to release a Striped Bass who is solidly hooked on a treble hook (or two) definitely puts the fish in harm's way even when ultimately released.
2. Eliminate commercial fishing entirely, or scale back the number of fish allowed to sell. Explanation: On Cape Cod / Massachusetts, the commercial fishermen many times are actually recreational fishermen who do the fishing part time to help pay for gas, tackle, etc. and derive their living doing something other than fishing. There isn't enough biomass of Striped Bass to actually make a living doing just Striped Bass fishing in Massachusetts.

Keep up the good work!

Paul Aldrich  
POB 408  
Chatham, MA.  
02633

**From:** [Michael Northrup](#)  
**To:** [Comments; stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Ammendment7  
**Date:** Wednesday, April 13, 2022 7:45:51 AM

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To the ASMFC

My name is Michael Northrup and I am sending you my comments on the proposed Amendment 7, for the management of striped bass, as requested by the ASMFC call for public comment.

My choices are

4.1

Tier 1

A1

B1

C1

Tier 2

A2

B1

C1

Tier 3

A2

B2

Tier 4

A

4.2

B- None

C1, C2

D2

4.4.1

B

4.4.2

B

4.6.2

B1-a

C3

D2

E2

Please act quickly to preserve our striped bass I truly feel as though money is a driving force in the decision making process here and those involved should be held accountable. This fishery is in trouble and needs help. Please act accordingly in a decision made on these matters. We have one ocean and one outdoors. I'd like to now tha my children and grandchildren will be able to enjoy it as much as I have.

Thank you, Michael Northrup

Massachusetts, U.S.A.

**From:** [RICHARD MARCHISOTTO](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped bass PID  
**Date:** Wednesday, April 13, 2022 6:21:57 AM

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Sent from my iPhone  
Dear ms. Franke

The purpose for this letter is to provide public comment regarding draft amendment 7 to interstate fishery management plan for Atlantic striped bass.

My name is Rich Marchisotto

I have been fishing for striped bass since 2005 boat or shore fishing. I have seen a drastic change in abundance of fish in my areas on Long Island. I was at last meeting in Smithtown and listened to you explanation of documents. I love this fishery and only want to do what is best to save it here is my options I choose.

Tier 1 sub option A1

Sub option B1

Sub option C1

Tier 2 ssb triggers

Sub option A2

Sub option B1

Sub option C1

Tier 3 recruitment triggers

Sub option A2

Sub option B2

Tier 4 deferred management plan

Option A

Recreational management measures

Option B2-a

Sub option C1 no gaffs for striped bass

Option d2

Rebuilding plan

Option B

Rebuilding plan framework

Option B

Management program equivalency

Option B1 a

Option c

Option D2

Thankyou  
Rich marchisotto  
16 4th ave  
Smithtown,ny 11787



**From:** [Geoff Lewis](#)  
**To:** [Comments](#)  
**Subject:** [External] Comment for Amendment 7  
**Date:** Wednesday, April 13, 2022 1:30:34 AM

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To the Commission:

My name is Geoff Lewis and as a Rhode Island surfcaster, I enjoy spending time on the water fishing and teaching my children how to fish for striped bass from shore from the many wonderful places within RI. Surfcasting for striped bass is both defining and integral for me as a person but is also a great source of joy and happiness for our family.

I believe it is important to take strong and conservative actions now to preserve and rebuild the stock, managing it for abundance and not yield. What might feel like overly conservative measures, are likely not, given that decisions are being made based on stock assessment data from the past (so our current real time starting position is likely worse, given overall trends). The actions we take now as a collective body need to get us in front of the situation proactively, shifting the narrative and thus easing pressure on the striped bass stock and "bending the curve" on its population. We have seen the consequences of not conserving the stock before and should avoid that outcome at all costs.

I have been lucky to participate in this incredible fishery for the past 15+ years and I am writing this letter, sharing my voice and concerns so that the next generations of up and coming striped bass fishermen have their chance to enjoy it and become hooked as well.

Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A3

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1  
Support B

4.4.2  
Support B

4.6.2  
Support B1-a  
Support C3  
Support D3  
Support E2

Thank you for the opportunity to comment.

Sincerely,

Geoff Lewis  
Westerly, RI  
Email: [GEOFFREY.T.LEWIS@GMAIL.COM](mailto:GEOFFREY.T.LEWIS@GMAIL.COM)

**From:** [Carl Heise](#)  
**To:** [Comments](#)  
**Cc:** [Jason E. Mcnamee](#); [KURT BLANCHARD](#); [DAVID BORDEN](#); [Sen. Susan Sosnowski](#); [Eric Reid](#); [stripercomments@gmail.com](#)  
**Subject:** [External] Amendment 7 - Comments  
**Date:** Tuesday, April 12, 2022 11:58:59 PM

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Greetings,

I am writing to provide my comments on ASMFC consideration of Amendment 7.

I am currently a Rhode Island resident and homeowner, stationed here on Active Duty in the U.S. Coast Guard, with 16 yrs of service.

I have fished for Striped Bass (striper or SB) recreationally over the past 20 yrs while living in NH, MA, NY, CT, and now RI proudly.

I am an avid Surfcaster, kayak fisherman, boater, outdoorsman, and aspiring conservationist. I have a BS in Biology, Minor in Environmental Science, with Graduate Certificate in Coastal Zone Management and graduate coursework in fisheries science. As a USCG Boarding Officer conducting Living Marine Resource Enforcement (LMRE), I have directly enforced fisheries laws at sea - including violations for the taking of Striped Bass outside 3nm / EEZ.

Whether anecdotally or from best available science, or careful naturalist observation, it seems clear to me the SB population in the northeast (NE) is overfished, is in critical decline and requires aggressive, timely management action to rebuild and sustain.

I implore you to please take this and all other opportunities to do everything in your purvue to reverse current downward trends and protect this beautiful and economically / ecologically important fish.

We ought to learn from the mistakes, missed opportunities, as well as the successes of past SB management. Much can be learned from other states successes in fisheries management as well. Though not the specific issues under discussion, I strongly believe careful consideration needs to be given immediately to SB gamefish status, catch & release only fishery, as well as closed seasons and/or areas to protect spawning aggregations - all of which I support. Holistic, ecosystem based protections are needed to protect spawning stocks along the entire migratory range.

Short-term economic concerns from various stake-holders, while important, need to be considered in the context of a potential collapse or moratorium - which will cause drastic and long-term financial losses for all involved. Please exercise the wisdom and foresight to change things while there is still a chance - and be willing to accept some short-term pain for long-term sustainment. Current and future generations of captains, mates, anglers, mechanics, truck-drivers, fish-mongers, hotel / rental propieters, retailers, and all manner of small / medium business owners will eventually thank you for looking at the big picture and not heeding the loudest, neediest shouts of those that are currently abusing the stocks. That is the leadership we need from you.

In general terms, I support managing SB for abundance  
- not for the minimum population that we hope can maybe sustain itself while we continue to skim off the top.

I don't envy your position in helping determine the specific measures, but - I feel large

breeding females need to be protected, I support the slot limit. Also that important year classes such as 2015, 2017+2018 need to be protected as they mature to spawning age - potentially by an increasing minimum size or variable slot.

I hope and trust that our fisheries scientists and managers can help identify regulations that achieve logical and science based balance of those priorities.

Either way - the commercial, financial, and recreational interests of stake-holders should take a back-seat to the health of the SB population - without a prolific biomass, there is no viable fishery, and everything else is moot.

Thank you for your time and consideration on this important topic. While it's one fish species being discussed here, I don't think it's possible to overstate the impact that the Striped Bass has on our coastlines unique character, and both our history and future alike.

In specific terms of Amendment 7, my comments are below my signature;

Sincerely,  
Carl R. Heise  
77 Washington St.  
Warwick, RI 02888

Amendment 7 Comments:

4.1 Management Triggers

Tier 1:

I support Sub-Option - A1

I support Sub-Option - B1

I support Sub-Option - C1

Tier 2:

I support Sub-Option - A2

I support Sub-Option - B1

I support Sub-Option - C1

Tier 3:

I support Sub-Option - A3

I support Sub-Option - B2

Tier 4:

I support Option A (status quo)

4.2.2 Measures to Address Recreational Fishing Mortality

Option C - Additional Gear Restrictions

I support Sub-Option - C1

I support Sub-Option - C2

Opt. D

I support Sub-Option - D2

4.4 Rebuilding Plan

4.4.1. I support Option - B

4.4.2. I support Option - B

4.6.2. Management Program Equivalency

Opt. B - I support Sub-Option - B1a

Opt. C - I support Sub-Option - C3  
Opt. D - I support Sub-Option - D3  
Opt. E - I support Sub-Option - E2

**From:** [Michael Frezza](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, April 12, 2022 11:45:02 PM

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Dear ASMFC,

A robust striped bass fishery is very important to me, my me, my family & friends, and a massive community of passionate anglers. I'm only 23 but when I am a Father I hope my son/daughter can experience the same great striped bass fishing that I enjoyed growing up on the Jersey Coast.

Living in a fishy shore community on a barrier Island (Long Beach Island) striped bass fishing has a rich history and is the way of life here. When the bass are running the community is vibrant. Everything from hotels, restaurants, marinas, convenience stores, gas stations, tackle shops and other small businesses are busy and the local economy is strong. Anglers come from far and wide to enjoy a day/weekend/week/month on the Island fishing the beaches and boats. The trickle down spending radiates from the striped bass economic engine.

While striped bass fishing has been really very good the past few years in my local waters and elsewhere in my state, I understand there is a coast wide issue. I'm curious to learn more about the results of 2020's 18% reduction as well as other news on the striped bass stock when the new stock assessment will be coming later this year. I support a responsible and precautionary management style with regulatory stability and reasonable access to the fishery.

I support the following...

Section 4.1 Management Triggers

Tier 1: Fishing Mortality (F) Triggers

Option A: Sub-option A1

Option B: Sub-option B1

Option C: Sun-option C1

Tier 2: Spawning Stock Biomass (SSB) Triggers

Option A: Sub-option A2

Option B: Sub-option B1

Option C: Sub-option C3

Tier 3: Recruitment Triggers

Option A: Sub-option A2

Option B: ASA's Variation of Sub-option B2

Tier 4: Deferred Mgmt Action

Option A: No Deferred Management Action

Section 4.2.2 Measures to address Recreational Release Mortality

Option B: Sub-option B2-a No Harvest Spawning Closure  
Option C: Sub-option C1 & C2  
Option D: Sub-option D1

4.3 Commercial Fishery Mgmt Measures *I know this isn't the time or place however it must be stated that striped bass are exponentially more valuable as a game fish. Now's the time for striped bass coast wide game fish status.*

4.4.1 Recruitment Assumption  
Option B

4.4.2 Rebuilding Plan Framework  
Option B

4.6.2 Management Program Equivalency  
Option B: Sub-option B1-a & B1-c  
Option C: Sub-option C3  
Option D: Sub-option D1  
Option E: Sub-option E2

Best Regards,  
Mike Frezza

**From:** [Ross Squire](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, April 12, 2022 10:54:58 PM

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April 12, 2022

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

Dear Emilie,

My name is Ross Squire and I offer the following public comment which reflects my personal choices of the options presented in Draft Amendment 7. I am an avid striped bass surfcaster and have been deeply disturbed with the depletion of the fishery and the fact that the fishery has been shown to be overfished with overfishing occurring.

This serious depletion of the fishery is a direct reflection and indication of the poor management of the Striped Bass Management Board. This depletion of the fishery did not occur overnight. The science has been pointing to the downward trend of the fishery for close to two decades. Amendment 7 must contain strict guidance for the Board which compels them to act quickly and decisively when the science indicates that the fishery is in trouble.

The following are the options which I personally endorse and while they may be identical to those options supported by some fishing organizations, they represent my personal choices and should not be classified as a form letter.

#### 4.1 Management Triggers

##### Tier 1-Fishing Mortality Management Triggers

- Option A1
- Option B1
- Option C1

##### Tier 2-Female SSB Management Triggers

- Option A2
- Option B1
- Option C1

##### Tier 3-Recruitment Triggers

- Option A3
- Option B2

##### Tier 4 Deferred Management Action

- Option A

#### 4.2.2 Recreational Release Mortality

- Option A



- Option C1
- Option C2
- Option D1

#### 4.4.1 Rebuilding Plan

Option B: Use low recruitment regime assumption (although an average of the standard recruitment method and the low recruitment regime seems more appropriate)

#### 4.4.2 Rebuilding Plan Framework

Option B

#### 4.6.2 Management Program Equivalency

- Sub-Option B1a
- Sub-Option B1c
- Sub-Option B2b
- Sub-Option C3
- Sub-Option D3
- Sub-Option E2

Sincerely,



Ross Squire  
Centerport, NY

**From:** [Zach Peirce](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Tuesday, April 12, 2022 10:07:54 PM

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Please, just do what's right for the fishery.

**From:** [jamie.philpott](mailto:jamie.philpott)  
**To:** [Comments](#); [Sen. TODD KAMINSKY](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Tuesday, April 12, 2022 10:06:00 PM

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Dear, Asmfc board members and commissioners.

I plead with you to take into great consideration the current state of our great fishery. Generations upon generations of Americans have enjoyed the wonderful pastime of striped bass fishing, countless memories have been shared up and down the coast from spring thru Fall year after year of year, our once great fishery is in grave danger of collapse.

I implore upon you to please dig deep when making the decision on the future of our fishery. We all should have plans to share this pastime with grandchildren in years to come.

Nothing should ever compromise the great migration of striped bass, sadly pollution, overdevelopment along the coast along with over fishing / Killing, poaching, By catch, poor education on fish handling are all major factors we are facing.

If we can do our part as a great team I feel we could really turn this around in a few years with some aggressive measures. It's happened in the past.

In closing I hope you all can please think  
About the future of our great fishery as we look into the face of uncertainty.

Best,

Jamie T Philpott  
917-902-8430

Please excuse any typos - Sent from my iPhone

**From:** [Brian McCall](#)  
**To:** [Comments](#); [Michael Armstrong](#); [Rep. Sarah K. Peake](#); [LOWELL WHITNEY](#); [Dan Mckiernan](#); [Raymond Kane](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Tuesday, April 12, 2022 9:43:10 PM

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To whom it may concern,

My name is Brian McCall and I am a lifelong fisherman and outdoorsman. I have been fishing since I was a child, progressing to fly fishing and tying my own flies for freshwater and saltwater. Fishing is incredibly rewarding, learning about fish behaviors, diet, environmental factors along with the opportunity to learn about and experience the surrounding environment. Additionally, as one progresses from an interest in fishing to a passion for fishing a deep respect develops for the target species as well as the supporting ecosystem. I fear we are losing the opportunity for this deep respect for the ecosystem and environment to develop in future generations with the decline of the striped bass fishery. After all, catching fish is what keeps newcomers engaged and interested. Without a strong, sustainable striped bass fishery, the ability to develop the next generation of passionate fishing participants is at risk in addition to our fishery.

My hope is the striped bass fishery can be saved and rebuilt as soon as possible. This will enable people like me to introduce fishing, particularly striped bass fishing to the next generation and teach them to be good, ethical sportsmen and sportswomen.

I support the current regulation of no Commercial fishing in the Cape Cod Canal. However, more can and should be done. As a flyfisher I see Catch & Release as well as Fly Fishing Only sections all over New England for trout and salmon. Perhaps it is time to implement Catch & Release areas for striped bass fishing, particularly in critical migratorion areas.

Below please find my comments on the individual tiers/options of the proposed Amendment 7. The options I support are marked bold.

#### 4.1 MANAGEMENT TRIGGERS

Tier 1: Fishing Mortality (F) Management Triggers

Option A: Timeline to Reduce F to the Target

**Support sub-option A1 (status quo)**

Option B: F Threshold Triggers

**Support sub-option B1 (status quo)**

Option C: F Target Triggers

**Support sub-option C1 (status quo)**

TIER 2: Female Spawning Stock Biomass (SSB) Management Triggers

Option A: Deadline to Implement a Rebuilding Plan

**Support sub-option A2**

Option B: SSB Threshold Trigger

**Support sub-option B1 (status quo)**

Option C: SSB Target Trigger

**Support sub-option C1 (status quo)**

TIER 3: Recruitment Triggers

Option A: Recruitment Trigger Definition

**Support sub-option A2**

Option B: Management Response to Recruitment Trigger

**Support sub-option B2**

TIER 4: Deferred Management Action

**Support option A (status quo)**

4.2 RECREATIONAL FISHERY MANAGEMENT MEASURES

Option B. Effort Controls (Seasonal Closures)

**Support sub-option B2**

Option C. Additional Gear Restrictions

**Support sub-option C1**

**Support sub-option C2**

Option D. Outreach and Education

**Support sub-option D1**

4.4 REBUILDING PLAN

4.4.1 Recruitment Assumption for Rebuilding Calculation

**Support option B**

4.4.2 Rebuilding Plan Framework

**Support option B**

4.6 ALTERNATIVE STATE MANAGEMENT REGIMES

4.6.2 Management Program Equivalency

Option B. Restrict the Use of Conservation Equivalency Based on Stock Status

**Support sub-option B1-a**

Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency

Proposals

**Support sub-option C3**

Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed

Fisheries

**Support sub-option D3**

Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed

Fisheries

**Support sub-option E2**

Thank you for the opportunity to comment. I hope that my voice will be heard.

Sincerely,

Brian McCall

Chelmsford, MA

**From:** [Collin Hertzler](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Tuesday, April 12, 2022 9:40:45 PM

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To Whom It May Concern,

The protection of striped bass populations is necessary. The scope of Amendment 7 is great, there are recreational, ecological, and economic concerns shared by groups holding similar and varied view points. This will not be a time to satisfy everyone, but this is the time to satisfy the future of these magnificent creatures. Please do what is right, put in regulation to make them more difficult to catch, shorter time frame, if any, period that allows for keeping fish, and make the laws and regulations with no concerns other than increasing the numbers of these fish in their native range. Thank you.

Best Regards,  
Collin Hertzler  
cell: 267-249-3237

**From:** [Winslow Dresser](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [michael.armstrong@mass.gov](mailto:michael.armstrong@mass.gov)  
**Subject:** [External] Amendment 7  
**Date:** Tuesday, April 12, 2022 9:38:18 PM

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ASMFC staff,

First off, thank you for your work on sifting through public comments and working to improve management of striped bass.

I am a recreational angler from Massachusetts who has found striped bass fishing to be one of the most important things in my life in the last few years. During the pandemic in particular, this fishery was one of the things that literally kept me going during long periods of isolation. I can't stress enough how much I care about these fish and seeing their population do well, and to me their highest value by far is alive and swimming in the ocean - not on a dinner plate, or in a fish shop, although I understand this is a shared public resource that will be utilized differently by different entities.

In terms of Amendment 7 - my greatest concern is around the abuse of conservation equivalency and the damage that those practices have done to this fishery. I would like to see extreme limits placed on the use of CE. In terms of the other issues at question: please don't delay action on management triggers, these fish should see protections as soon as any sign of trouble appears, and I would like to generally see the most protective and proactive measures taken, and rebuilding plans instituted as aggressively and rapidly as possible. I am open to closures if that is necessary, but would like those to be targeted in areas with high release mortality (warmer water etc), or where closures might truly protect spawning fish. "No target" closures do not make much sense to me except in conditions of high water temperature, but "no harvest" closures seem very reasonable in any area where they can help protect this fishery.

I also support the proposal by Michael Armstrong to allow for quicker response to management concerns with new stock data, and am grateful to have people like Mr. Armstrong representing my state's interests at ASMFC.

Please, do what is needed to get the striped bass stock back where it used to be. The rebuilding of this fishery was a huge success story years ago, and it can be a success story again.

Thank you,  
Winslow Dresser  
Dartmouth, Massachusetts



**From:** [Anthony Poirier](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Tuesday, April 12, 2022 9:18:24 PM

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To the ASMFC:

My name is Anthony Poirier. I live in Westport, MA and fish for striped bass in MA and RI. I am responding to the request for public comments on Amendment Seven for the management of striped bass.

I hope my participation in the conservation process does some good for the fish. I attended both RI and MA Amendment 7 hearings and one thing I learned during and later researched a little on my own is that MRIP data is likely suspect. Unfortunately the time to improve its accuracy as it relates to Amendment 7 has passed but seems like there is room for future improvement with the hopes of better satisfying all stakeholders.

But the fish don't care what data we reference. They're in decline again and it's past time to act. Again.

Selecting options like it's a multiple choice final exam seems woefully inadequate given the gravity of the situation but I will play by the rules and place some faith in the system. It is my hope that the choices below will better enable governing agencies to improve striped bass abundance:

4.1

Tier 1

A1

B1

C1

Tier 2

A2

B1

C1

Tier 3

A2

B2

Tier 4

A

4.2

B- None

C1, C2

D2

4.4.1

B

4.4.2

B

4.6.2

B1-a

C3

D2

E2

Thank you for your time,  
Anthony

**From:** [Joshua Freiberger](#)  
**To:** [Comments](#); [Emerson Hasbrouck](#); [Maureen Davidson](#); [James Gilmore](#); [CAROL HOFFMAN](#); [Sen. TODD KAMINSKY](#)  
**Subject:** [External] Amendment 7  
**Date:** Tuesday, April 12, 2022 9:03:20 PM

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To the Atlantic States Marine Fisheries Commission and New York State representatives:

I am a recreational striped bass fisherman based in Montauk, New York writing to express my views on Amendment 7.

I support:

- Sub-option A1 (status quo): Reduce F to a level that is at or below the target within one year.
- Sub-option B1 (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.
- Sub-option C1 (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.
- Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment.
- Sub-option B1 (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].
- Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].
- Sub-Option A2: The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years. The high recruitment reference period used for this trigger may be adjusted as recommended by the TC during benchmark stock assessments. This trigger alternative has a moderate sensitivity; it is more sensitive than the status quo but less sensitive than sub-option A3.
- Sub-option B2: If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.
- Option A (status quo): No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.
- Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

- Sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.
- Sub-option D2: It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns.
- Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.
- Option B: 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 recruitment assumption specified in Amendment 7) 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.
- Sub-option B1-a: CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.
- Sub-option C3: CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30.
- Sub-option D2: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.
- Sub-option E2: Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Thank you for your consideration.

Josh Freiberger  
11 Jefferson Road  
Montauk, NY 11954

--

Joshua R. Freiberger | (978) 621-7195 | [joshua.freiberger@gmail.com](mailto:joshua.freiberger@gmail.com)

**From:** [Tyler O'Neill](#)  
**To:** [Comments](#); [JOHN CLARK](#); [Roy Miller](#); [Rep. William J Carson](#); [Craig D Pugh](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7 Striped Bass Comments  
**Date:** Tuesday, April 12, 2022 8:33:09 PM

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Hello, my name is Tyler O'Neill. ALong with my father, we own the largest fly fishing company in the state of Delaware. I'm a diehard fly fisherman, and my first fish on a fly rod was a striped bass back in 2006 when the stock was abundant, and this species holds a spot near and dear to my heart. Given that, here would be my preferred options for amendment 7

#### 4.1 Management Triggers

##### Tier 1

Option A - I support sub-option A1  
Option B - I Support sub-option B1  
Option C - I support sub-option C1

##### Tier 2

Option A - I support sub-option A2  
Option B - I support sub-option B1  
Option C - I support sub-option C1

##### Tier 3

Option A - I support sub-option A2  
Option B - I support sub-option B2

##### Tier 4

I Support Option A  
Option C - I support sub options C1 and C2  
Option D - I support sub option D2

#### 4.4 Rebuilding Plan

4.4.1 - I support Option B  
4.4.2 - I support option B

#### 4.6.2 Conservation Equivalency

Option B - I support sub option B1-a  
Option C - I Support sub-option C3  
Option D - I Support sub-option D2  
Option E - I Support sub-option E2

Thank you for your time and I hope to see the board vote on the side of conservation and with the mindset of preserving and restoring the stock of this fantastic fish.

**Tyler O'Neill**  
**Norvise**

PO Box 310

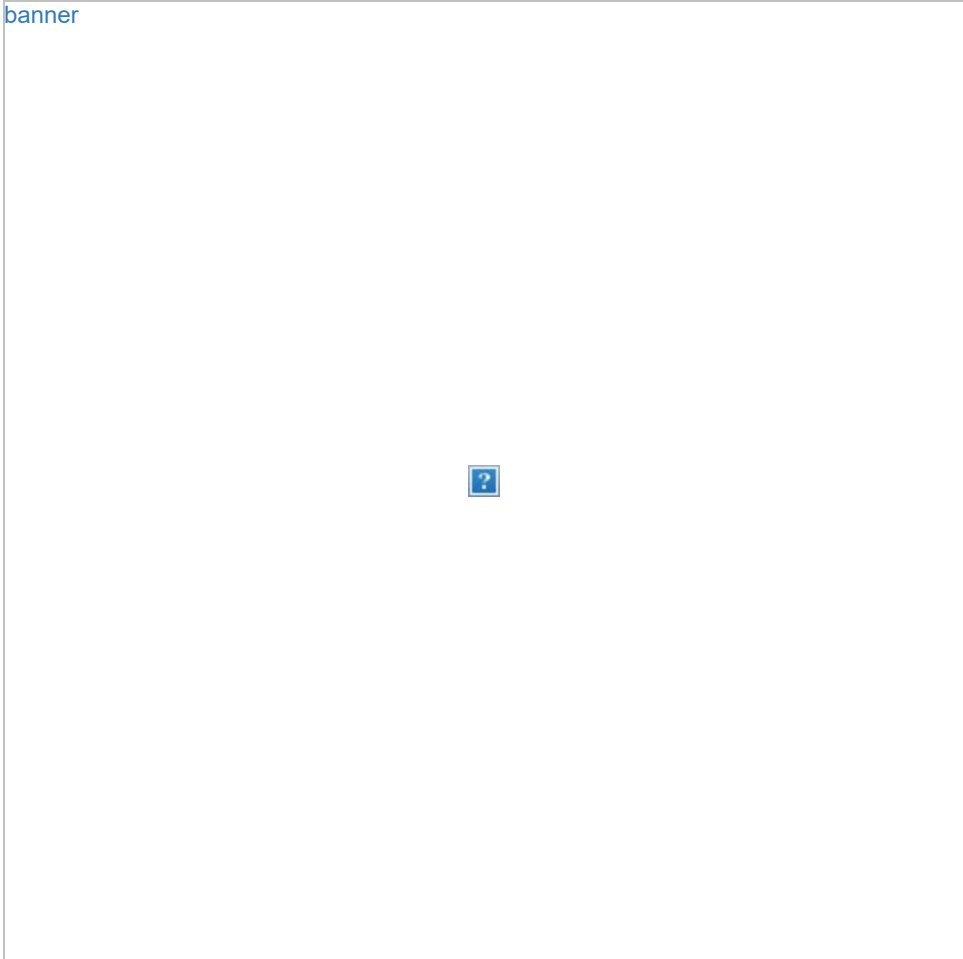
Hockessin, DE 19707

Email: [tyler@nor-vise.com](mailto:tyler@nor-vise.com)

Phone: 302-635-7694

[www.nor-vise.com](http://www.nor-vise.com)

banner



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**From:** [Chase Freiman](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7.  
**Date:** Tuesday, April 12, 2022 8:30:49 PM

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Dear Commission,

I am writing to you with my option on what needs to be done with Amendment 7. Striped bass have been overfished and we must act now to protect these fish. Striped bass are worth more to the economy alive in the water than dead on your dinner plate. Therefore we must act now and save these iconic fish. Here are my thoughts

#### 4.1 Management Triggers

Tier 1: Fishing Mortality (F) Triggers

##### **Option A: Timeline to Reduce F to the Target**

**I Support Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year.

##### **Option B: F Threshold Triggers**

**I Support Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

##### **Option C: F Target Triggers**

**I Support Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

Tier 2: Spawning Stock Biomass (SSB) Triggers

##### **Option A: Deadline to Implement a Rebuilding Plan**

**I Support Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

##### **Option B: SSB Threshold Trigger**

**I Support Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

##### **Option C: SSB Target Trigger**

**I Support Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

Tier 3: Recruitment Triggers

## **Option A: Recruitment Trigger Definition**

**I Support Sub-option A2:** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

## **Option B: Management Response to Recruitment Trigger**

**I Support Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

Tier 4: Deferred Management Action

### **I Support Option A (status quo): No Deferred Management Action.**

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

## **4.2.2 Measures to Address Recreational Release Mortality**

### **Option C. Additional Gear Restrictions**

**I Support Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**I Support Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

### **Option D. Outreach and Education**

**I Support Sub-option D2:** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

## **4.4 Rebuilding Plan**

### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

**I Support Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

### **4.4.2 Rebuilding Plan Framework**

**I Support Option B:** 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 recruitment assumption specified in Amendment 7) 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.

### **4.6.2 Management Program Equivalency (Conservation Equivalency)**



## **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

**Sub-option B1-a:** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

## **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

**I Support Sub-option C3:** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

## **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

**I Support Sub-option D2:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

## **Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

**I Support Sub-option E2:** the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Thank you

- chase Freiman

**From:** [John Bunar](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Ammdmt 7  
**Date:** Tuesday, April 12, 2022 8:23:28 PM

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Dear Commissioners

My name is John Bunar. I am a Massachusetts commercial fisherman , charter boat captain and tackle shop owner. I feel I have a balanced perspective on the management of Striped Bass

The one absolute need of my combined operations is a strong population of bass. I need recreational participants to buy tackle , charter customers to smile with glee and i certainly need to sell bass.

I can tell you from my eyes on the water and in the air, the population has greatly decreased.

I am absolutely in favor of rules that will increase the min size. Such regulation was proven effective in the past. Recreational catch and release mortality was proven to not impede progress made with high size limits in the past. The late 80's and early 90's are proof that a high size limit will solve our ills. Unproven science should not prevent the implementation of regulations proven to be spectacularly effective in the past. We walked this path 35 years ago in far more uncomfortable shoes. A 36 or 38" min coastal size limit easily will get the job done.

Absolutely Devastating to my business would be recreational closures. Such measures must be avoided or serious economic injury will occur to not only directly impacted business but also to the supporting vendors. I will be out of business. Not a pleasant thought with a kid in college.

I ask that size limit restrictions be explored. They are needed , they will work , and they will protect the striped bass economy

Yours at Anchor  
Capt John Bunar

Please make rules

Please implement

Sent from my iPhone

**From:** [Mark](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7  
**Date:** Tuesday, April 12, 2022 7:51:57 PM

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My name is Mark Dondero and I am an avid surfcaster from the state of Connecticut. I have to say that I have lost faith in the ASMFC and I don't think I'm alone. The time has come to do the right thing. To show leadership and courage. To rebuild the striped bass stock for abundance. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Mark Dondero

Willington, Connecticut

Email: [markd0610@gmail.com](mailto:markd0610@gmail.com)



**From:** [Seth Megargle](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Comments  
**Date:** Tuesday, April 12, 2022 7:44:12 PM

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To whom it may concern:

Captain Seth Sportfishing relies heavily on Striped Bass as a targeted species for our clients. We would like to see the fruits of the slot limit play out before there is a change in the way Striped Bass are regulate. We would like to maintain status quo for the current way Stripers are regulated.

We would like to maintain that the Charter industry experience extremely low mortality rates with Striped Bass due to the heavy gear and methods of fishing. Even over slot Bass are handled with extreme care by a professional mate and are released quickly and safely.

In addition we do not have confidence in the current MREP data that Is used to calculate Striped Bass harvests. We experience large amounts Bass in our area of all age classes and feel that the current slot limit that protects the large breeding females is sufficient to sustain the stock while also allowing harvest for food.

If the regulations were to become even more restricted or were there a closure to the fishery, that would be detrimental to our business and livelihood. If there is a need for more restricted harvest please consider allowing the for hire fleet and opportunity to be separated with its own quotas, in order to ensure our business can stay afloat.

Thank you for you time and consideration in these matters!

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**From:** [Amr ElShaer](#)  
**To:** [Comments](#)  
**Subject:** [External] DRAFT AMMENDMENT 7  
**Date:** Tuesday, April 12, 2022 7:27:32 PM

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To the Commission,

I am writing to provide my comments to Draft Amendment 7. I am a New Jersey resident and I currently fish for Striped Bass 80-90 days a year. I am primarily a shore based surfcaster and I go fishing on a party boat two to three times a year. I have been fishing consistently for the past fifteen years and I keep meticulous fishing logs of my fishing trips. In my opinion there are 2-3x the number of shore based fisherman today than there was 15 years ago. Social media sites like Facebook, Instagram and Youtube alert lazy fishermen as to where and when the striped bass bite is hot. I am not complaining about this reality. I just want the commission to understand that the striped bass are pressured. Despite the increase in fishermen, my logs show that the number of Striped bass caught in all year classes has been declining. I believe the commission has an opportunity in draft Amendment 7 to address the declining stock and save this species so future anglers can still participate in this valuable economic activity.

The Public Comment Questions: I believe what is more important is rebuilding the stock quickly and undertaking significant changes to do so. Accordingly, my recommended choices for the management options follow my beliefs and preferences

#### Management Triggers

##### *Tier 1-Fishing Mortality Management Triggers*

*Option A1*

*Option B1*

*Option C1*

##### *Tier 2-Female SSB Management Triggers*

*Option A2*

*Option B1*

*Option C1*

##### *Tier 3-Recruitment Triggers*

*Option A3*

*Option B2*

##### *Tier 4-Deferred Management Action*

*Option A*

#### *4.2.2 Recreational Release Mortality*

*Option A*

*Option C1*

*Option C2*

*Option D1*

#### *4.4.1 Rebuilding Plan*

*Option B*

#### *4.4.2 Rebuilding Plan Framework*

*Option B*

*4.6.2 Management Program Equivalency*

*Sub-Option B1a*

*Sub-Option B1c*

*Sub-Option B2b*

*Sub-Option C3*

*Sub-Option D3*

*Sub-Option E2*

I understand that the commission has many constituents with disparate interests and goals. This is not an easy task but I believe that decisive action to build back the stock quickly will only cause short term pain while providing long term benefits.

Thank you,

Amr ElShaer  
862-500-1574

From: [robert young](#)  
To: [Comments](#); [Cheri Patterson](#); [Renee Zobel](#)  
Subject: [External] Draft Amendment 7  
Date: Tuesday, April 12, 2022 6:11:43 PM

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## Striped Bass Conservation

Greetings to All,

Thank you for your long-standing civil service to our wonderful state of New Hampshire. I am writing to you as a concerned citizen regarding the current state of the striped bass population and the role we all play ensuring its survival. I have been following the public meetings regarding Amendment 7 and feel it is important to voice my concern on several sections being reviewed.

First and foremost, I believe it is critical for all parties involved to be heard such that we can build a comprehensive and effective plan which will ultimately lead to a sustainable, viable, and robust population of striped bass.

As a recreational angler who loves to fly fish for these amazing gamefish, I can't sit back and expect other anglers to raise concerns unless I'm willing to do so as well.

I have three main areas I would like to address regarding Amendment 7.

First, I have a position on the area charted section 4.1 - Management Triggers. Below is a list of areas I strongly support under this chapter:

### **4.1 Management Triggers**

Tier 1: Fishing Mortality (F) Triggers

#### **Option A: Timeline to Reduce F to the Target**

*I support: Reduce F to a level that is at or below the target within one year.*

#### **Option B: F Threshold Triggers**

*I support the status quo*

#### **Option C: F Target Triggers**

*I support status quo*



Option A: Deadline to Implement a Rebuilding Plan

*I support Sub-option A2*

Option B: SSB Threshold Trigger

*I support status quo*

Option C: SSB Target Trigger

*I support status quo*

Option A: Recruitment Trigger Definition

*I support Sub-option A2*

Option B: Management Response to Recruitment Trigger

*I support Sub-option B2*

Tier 4: Deferred Management Action

*I support status quo*

Second, I have a strong position towards section 4.4 - rebuilding plan. I believe the overall focus needs to be centered around rebuilding the stock of striped bass along the **entire** eastern seaboard. A comprehensive and sensible, unified approach is key. Dividing regulations across individual states or regions makes little sense and is detrimental to the overall objective of rebuilding striped bass stocks for everyone's benefit.

## 4.4 Rebuilding Plan

### 4.4.1 Recruitment Assumption for Rebuilding Calculation

*I support Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low*

recruitment regime assumption as identified by the change point analysis.

#### 4.4.2 Rebuilding Plan Framework

*I support Option B: 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 recruitment assumption specified in Amendment 7) 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.*

Third, I maintain a strident stance on Management Program Equivalency. I am very concerned about the risks involved, when implemented, with conservation equivalency as there is no measurement for accountability. What procedure is followed to ensure enforcement? Moreover, who is accountable when benchmarks are not achieved?

#### 4.6.2 Management Program Equivalency (Conservation Equivalency)

##### Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status

*I support Sub-option B1-a: CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.*

##### Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals

*I support Sub-option C3: CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.*

##### Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries

*I support Sub-option D2: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.*

## Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries

*I support Sub-option E2: the percent reduction/liberalization projected for the FMP standard at the state-specific level.*

I express my deep gratitude for your time and for the opportunity for me to voice my concerns.

Best,

Robert Young  
Stratham, NH

**From:** [Kevin Downing](#)  
**To:** [Comments](#)  
**Subject:** [External] comment for amendment 7  
**Date:** Tuesday, April 12, 2022 6:11:05 PM

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Hello,

My name is Kevin Downing and I am an avid surfcaster from the state of Massachusetts. As a recreational surfcaster that has been fishing for stripers for the last 25 years, it is painfully obvious the state of our fishery has declined substantially. We are on the precipice of a complete disaster with regard to the striped bass fishery. It is imperative now, more than ever we take drastic action to manage for abundance and bring this fishery back from the brink. Management decisions and tactics over the last decade or more have almost entirely failed to preserve our fishery. The future of this beloved and often underappreciated game fish lies in your hands. For better or worse, avid fisherman and women like myself are relying on your organization to save our fish. I implore you to take the swift and drastic action needed to prevent a disastrous collapse of the striped bass. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a  
Support C3  
Support D2  
Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Kevin Downing  
Winthrop, Massachusetts  
Email: [19downing91@gmail.com](mailto:19downing91@gmail.com)

**From:** [Blake McHenry](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass  
**Date:** Tuesday, April 12, 2022 6:05:48 PM

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Hello,

I have grown up on the shores of Long Island fishing for striped bass. It's in our family. I have guided them, fished with them with my dad, brother, and wife. They mean so much to us, not only in an economic fashion, but in as an identity. It what we look forward to when the leaves finally bud and the water warms. It gives me abs my family excitement and jitters even to this day as we prepare to fish for them every season.

Over the past ten years we have seen a huge decline in our fishery. Now, the good fishing only happens at select times and in select places. The population that remains is also getting even more pressure due to low numbers.

Me and my family plead that you will do the right thing. Do it not for us, but for the striped bass. The regal fish that gives our country an identity, fuels our dreams, and gives us hope we can protect and manage them properly for my kids. Heck. For my great grandkids!

Let's do the right thing and manage the fishery in the name of striped bass. I think we should completely do away with a retention all together. All fish should be released until the stock is robust again like it was in the 90s.

We have one shot at this. Let's do it right.

Thank you,

Blake McHenry  
860.550.0343

**From:** [Mark Farrell-Churchill](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, April 12, 2022 5:34:29 PM

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Emilie Franke  
FMP Coordinator  
1050 N. Highland Street  
Suite 200 A-N  
Arlington, Virginia 22201

I appreciate the opportunity to weigh in on striped bass management. Obviously this is a complex topic, and the list of options reflects that fact; I have heard it described as "the Chinese restaurant menu from hell". You will find my recommendations below, but I wanted first to write a few words describing my personal history and how it affects my viewpoints on this species.

It would be understandable, upon looking at my return address, to wonder what interest a Nebraskan could reasonably have in striped bass. But I grew up in Maryland, fishing the Chesapeake Bay and its tributaries as well as coastal areas inshore of the barrier islands with my grandfather, and we called them "rockfish". They were nearly as elusive as unicorns at the time, though, for this was the late 1970s and early 1980s, when rockfish numbers had crashed and there was talk of listing *Morone saxatilis* as an endangered species. I remember catching bluefish and flounder, as well as incidentals like sea robins and small sharks, but rockfish eluded me.

By the time action was taken and the species rebounded in the 1990s, I was gone, marriage and career having taken me away from my home waters. It is only now that I find myself able to reclaim my heritage, with the realistic prospect of returning to the Atlantic seaboard from time to time with the resources to fish—in fact, my daughter and I will be participating in a striped bass tournament on Cape Cod this May, casting flies to fish only recently returned from the Chesapeake (and representing, in a very small way, the positive impact of abundant stripers to the coastal economy). But we missed the heyday of the rockfish, as their numbers are again in decline for a variety of reasons that includes overfishing of both the rockfish themselves and of forage species such as menhaden.

This decline, it must be noted, has been presided over by this Board. **I do not, of course, attribute this to ill will or apathy.** Opportunities for course correction have been lost through delays in responding to downturns in productivity or upticks in mortality, and hampered by misuse of conservation-equivalency provisions on the part of certain states—including, regrettably, Maryland. Such misuse of CE is particularly distressing not just because Maryland is my home state, but because the Chesapeake is the single most important spawning area for the species. Call them stripers, or linesiders, or whatever you like, but they mostly begin their lives as rockfish, and management or mismanagement of the population in the Chesapeake will affect the species as a whole, up and down the Atlantic coast.

My recommendations will therefore be intended to empower the Board to manage striped bass more effectively, with the ability (and responsibility) to respond more quickly and with fewer opportunities for individual states to undermine the Board's intentions. And I will point out, with hope, that rockfish did in fact respond to conservation actions undertaken in the 1980s. They did recover, spectacularly, and they can do so again. While the clock is indeed ticking,

and unnecessary delay would be unconscionable, it is not too late to bring them back **with a focus on abundance**.

On, then, to my recommendations, as selected from the "Chinese menu":

## MANAGEMENT TRIGGERS

### Tier 1: Fishing Mortality (F) Triggers

Option A. Timeline to Reduce F to Target

**I support Sub-option A1:** reduce F to the target level (or below) within one year.

Option B. F Threshold Trigger

**I support Sub-option B1:** take steps to reduce F as soon as the threshold is exceeded.

Option C. F Target Trigger

**I support Sub-option C1:** reduce F if F exceeds the target level for two consecutive years and female SSB is below target in either year.

Any sampling

errors that may result from using a single year's MRIP data will almost certainly be less consequential than the risks posed by delaying action. Delay does not benefit the resource. Excessive mortality *combined with a reduction in spawning stock* is cause for particular concern—and immediate action. Fishing mortality is one the most obvious factors affecting striped bass populations, and happily one of the most straightforward to address.

### Tier 2: Female Spawning Stock Biomass (SSB) Triggers

Option A: Deadline to Implement a Rebuilding Plan

**I support Sub-option A2:** two-year deadline to implement a rebuilding plan.

Option B. F Threshold Trigger

**I support Sub-option B1:** action required if SSB falls below the threshold.

Option C: SSB Target Trigger

**I support Sub-option C1:** action required if SSB falls below target for two consecutive years and F exceeds target in either year.

Commentary: My recommendations for threshold and target triggers are actually to maintain the status quo; the only change I am advocating here is to establish a deadline for the implementation of a rebuilding plan. Striped bass were declared overfished in 2018, and yet no rebuilding plan has been put in place.

### Tier 3: Recruitment Trigger

Option A: Recruitment Trigger Definition

**I support Sub-option A2, Moderate Sensitivity:** any of the core JAIs is below the 25th percentile of values from 1992-2006 for 3 consecutive years. (Would have tripped 3 times since 2003.)



Option B: Management Response to Recruitment Trigger

**I support Sub-option B2**, Most Conservative Response: if F is greater than interim F target (using low recruitment assumption), reduce F to interim F target within one year.

Commentary: There needs to be a functioning trigger, but it need not be a hair-trigger; even under the most benign circumstances, this species has good years and poor years, and recruitment may be cyclical to a degree. Once the trigger is tripped, however, indicating a period of low recruitment, the response should be immediate.

Tier 4: Deferred Management Action

**I support Option A**, No Deferred Management Action: if a management trigger is tripped, the Board must take the corresponding action.

Commentary: This is a status-quo recommendation; all other proposals would defer action. As I have stated already, and I consider this a guiding principle, *delay does not benefit the resource*.

## RECREATIONAL RELEASE MORTALITY

**I support Option A**: circle hooks required when recreationally fishing for striped bass with bait.

Option B. Effort Controls (Seasonal Closures)

**I support Sub-option B2-a**, No-Harvest Spawning Closure Required. All recreational harvest of striped bass would be prohibited during Waves 1 and 2 (Jan-Apr) in spawning areas (Chesapeake Bay, Delaware River/Bay, Hudson River, Kennebec River).

Option C. Additional Gear Restrictions

**I support both Sub-option C1 and Sub-option C2**, respectively banning the use of gaffs and requiring the release of striped bass caught with non-compliant gear.

Option D. Outreach and Education on Best Practices for Handling and Release

**I support Sub-option D2**, recommended outreach and education.

Commentary: A, C, and D above are common-sense provisions that should be adopted immediately. B is far less straightforward; the various "no-targeting" closures proposed sound good on paper but are practically unenforceable, as violators can all too easily claim to be targeting bluefish or other co-occurring species. Only the no-harvest spawning-closure proposal stands a chance of being effective, and then only in conjunction with the A, C, and D components being taken seriously by anglers and law enforcement.

## REBUILDING PLAN

Options for Recruitment Assumption for 2022 Assessment

**I support Option B**: Low Recruitment Assumption.

Options for Responding to the 2022 assessment (if needed)

**I support Option B**: Board Action

Commentary: Both of these would be changes to the status quo; both are justified and necessitated by the current situation. Recent recruitment figures from the Maryland portion of the Chesapeake are as low as they've been since the "bad old days" of the late 1970s and early 1980s; the low recruitment assumption is just a formal means of confronting reality, and direct board action could have new regulations in place a year sooner than the alternative (via addendum). Delay does not benefit the resource.

## CONSERVATION EQUIVALENCY

With respect, I oppose the status quo Option A: Board Discretion on Conservation Equivalency Restrictions and Requirements.

**I strongly support Option B:** Restrict the Use of Conservation Equivalency Based on Stock Status. More specifically, **I support Sub-option B1-a and Sub-option B1-c**, under which CE programs would not be approved when the stock is at or below the spawning stock biomass threshold (i.e., overfished) or when fishing mortality is at or above the fishing mortality threshold (i.e., overfishing is occurring).

Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals

**I support Sub-option C3**, capping the margin of MRIP error at 30%.

Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries  
**I support Sub-option D2**, which would establish a default uncertainty buffer for CE proposals of 25%.

Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries  
**I support Sub-option E2**, which would set state-specific standards for reduction or liberalization percentages relative to the FMP standard.

Commentary: As I noted in my introductory comments, misuse of CE by certain states has undermined the management of striped bass to the detriment of the species. Maintaining the status quo in this area would be a disservice to the resource and to those who depend upon it for recreation or for their livelihoods. Flexibility in management sounds like a noble goal, and I have no doubt that Maryland and New Jersey will push hard to maintain the status quo. But *if the prevailing rules at any given point in time are insufficient to maintain healthy, abundant rockfish populations, there is no point to making further concessions; fix the problems, recover the fish to acceptable levels, and then we can talk.* Sub-options B1-a and B1-c are key components for striped bass management specifically because they enshrine that principle. And sub-option E2 would ensure that states are held responsible for their own waters: if they manage the resource well, they may be afforded more flexibility, but if management goals are not being met, if rockfish are not sustainably abundant, then states should not have the option of deviating from the overall management plan.

Thanks once again for the opportunity to comment on the draft amendment, and for your attention to this (necessarily) long letter.

Sincerely,

Mark Farrell-Churchill

3242 Orchard St.  
Lincoln, Nebraska 68503  
(402) 499-6408  
[mark.farrell.churchill@gmail.com](mailto:mark.farrell.churchill@gmail.com)

**From:** [Dean Romanow](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, April 12, 2022 5:25:37 PM

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I am a frequent striper fly fisher. I spend much time fishing Maine saltwaters. Virtually all my fishing is "catch and release" with perhaps 1 or 2 stripers for the table.

My name is Dean Romanow and I live in Massachusetts.

I strongly believe with all my heart and intellect that the state (Maine and Massachusetts) must do **more** to conserve, manage, protect and enhance the opportunities for the stripers to thrive with minimal external assault and challenges. And I support fully the American Saltwater Guides Association and believe their position, regarding management and striper conservation, is critical for the immediate and long term health of the fishery.

Thanks for accepting my input and opinion.

Dean Romanow

**From:** [Scott Hoffer](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, April 12, 2022 4:41:59 PM

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I have 2 main comments I'd like to submit.

The first is in regards 4.4.1 Recruitment Assumption for Rebuilding Calculation.

I fully support Option B.

The second comment is in regards to the Deadline to Implement a Rebuilding Plan

I am in favor of Sub-option A2: Two-Year Deadline to Implement a Rebuilding.

I feel that if we can stick to a plan and work together, that we can ensure that the greatest fish in the Atlantic can thrive.

Thanks,  
Scott Hoffer

**From:** [Shawn O'mara](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Public comment  
**Date:** Tuesday, April 12, 2022 4:35:39 PM

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Dear ASMFC,

A robust striped bass fishery is very important to me, my family, my businesses and my community. I am a fisherman that primarily focuses on striped bass. My family has owned and operated Captain Mike's Marina, out of Tuckerton, NJ for over 20 years.

Living in a fishy shore community on Mystic Island striped bass fishing has a rich history and is the way of life here. When the bass are running the community is vibrant. Everything from hotels, restaurants, marinas, convenience stores, gas stations, tackle shops and other small businesses are busy and the local economy is strong. Anglers come from far and wide to enjoy a day/weekend/week/month on the Island fishing the beaches and boats. The trickle down spending radiates from the striped bass economic engine.

While striped bass fishing has been really very good the past few years in my local waters and elsewhere in my state, I understand there is a coast-wide issue. I'm curious to learn more about the results of 2020's 18% reduction as well as other news on the striped bass stock when the new stock assessment will be coming later this year.

I support a responsible and precautionary management style with regulatory stability and reasonable access to the fishery.

I support the following:

Section 4.1 Management Triggers

Tier 1: Fishing Mortality (F) Triggers

Option A: Sub-option A1

Option B: Sub-option B1

Option C: Sub-option C1

Tier 2: Spawning Stock Biomass (SSB) Triggers

Option A: Sub-option A2

Option B: Sub-option B1

Option C: Sub-option C3

Tier 3: Recruitment Triggers

Option A: Sub-option A2

Option B: ASA's Variation of Sub-option B2

Tier 4: Deferred Mgmt Action

Option A: No Deferred Management Action

Section 4.2.2 Measures to address Recreational Release Mortality

Option B: Sub-option B2-a No Harvest Spawning Closure

Option C: Sub-option C1 & C2

Option D: Sub-option D1

4.3 Commercial Fishery Mgmt Measures *I know this isn't the time or place however it must be stated that striped bass are exponentially more valuable as a game fish. Now's the time for striped bass coast wide game fish status.*

4.4.1 Recruitment Assumption

Option B

4.4.2 Rebuilding Plan Framework

Option B

4.6.2 Management Program Equivalency

Option B: Sub-option B1-a & B1-c

Option C: Sub-option C3 Option D: Sub-option D1

Option E: Sub-option E2

Regards,

Shawn O'Mara

**From:** [Gabriel Montemuro](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Tuesday, April 12, 2022 4:31:49 PM

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To the ASMFC:

My name is Gabe Montemuro. I am an attorney licensed in Pennsylvania and New Jersey and I am responding to your request for public comments on Amendment Seven for the management of striped bass.

Here are my choices for each proposed regulation.

4.1

Tier 1

A1

B1

C1

Tier 2

A2

B1

C1

Tier 3

A2

B2

Tier 4

A

4.2

B- None

C1, C2

D2

4.4.1

B

4.4.2

B

4.6.2

B1-a

C3

D2



E2

I have been a recreational angler in the saltwater of NJ since before I can remember. My dad and my uncle would pull me out of bed before the sun was up to go for fluke and Black Sea bass. Eventually I went off and got busy with college and grad school and getting married. My dad got older and sold his boat. I lost my connection with fishing.

Then Covid happened and our world changed forever. In an ever changing and stressful world, I started fishing again as a way to stay sane, stay active, relieve my anxieties, and reconnect with nature. Surfcasting, which began as a new pandemic hobby, soon became a lifelong commitment and passion the moment I pulled my first striped bass out of the surf.

I (and many other recreational anglers) are willing to meaningfully sacrifice for the purpose of replenishing the striped bass population. We value the resource and understand that short-term sacrifice now could save the future of the species, the regional coastal economies that depend on it, and our very identities as dedicated striped bass fisherman.

Please stand up and defend the striped bass. End overfishing swiftly and do not promote, enable, or acquiesce to loopholes or state-by-state regulations which, by design, serve to undermine the ASMFC's mission. Conservation equivalence is neither.

Please manage striped bass for abundance, and do not yield.

Thank you,  
Gabriel T. Montemuro

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Gabe Montemuro  
215-906-1438

**From:** [Nick Praver](#)  
**To:** [Patrick Keliher](#); [Rep. JAY MCCREIGHT](#); [Megan Ware](#); [Sen. Dave Miramant](#); [Stephen Train](#); [Comments](#); [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, April 12, 2022 4:08:27 PM

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Hi all,

Thank you for your time.

I am emailing in regards to the 4 options included in Draft Amendment 7 concerning striped bass.

As a recreational angler, part time tackle shop employee, retired deckhand and soon to be charter captain/guide, this fish means a lot to me. It has been alarming and disheartening to witness this fishery that once was a conservation success go into such a decline.

For a fish that migrates from the Chesapeake all the way to Maine it is vital for our coastal economies to have a healthy fishery. This is especially true here in Maine as we are without any other options for inshore sportfish species to target.

Please consider me, and the many others like myself who depend on this fishery, as a way of life when making your decisions on the topics below.

Here are my comments on Amendment 7:

#### **4.1 Management Triggers**

Tier 1: Fishing Mortality (F) Triggers

##### **Option A: Timeline to Reduce F to the Target**

**I Support Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year.

##### **Option B: F Threshold Triggers**

**I Support Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

##### **Option C: F Target Triggers**

**I Support Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

Tier 2: Spawning Stock Biomass (SSB) Triggers

##### **Option A: Deadline to Implement a Rebuilding Plan**

**I Support Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

##### **Option B: SSB Threshold Trigger**

**I Support Sub-option B1 (status quo):** If female SSB falls below the SSB threshold,

the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

### **Option C: SSB Target Trigger**

**I Support Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

Tier 3: Recruitment Triggers

### **Option A: Recruitment Trigger Definition**

**I Support Sub-option A2:** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

### **Option B: Management Response to Recruitment Trigger**

**I Support Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

Tier 4: Deferred Management Action

### **I Support Option A (status quo): No Deferred Management Action.**

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

## **4.2.2 Measures to Address Recreational Release Mortality**

### **Option C. Additional Gear Restrictions**

**I Support Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**I Support Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

### **Option D. Outreach and Education**

**I Support Sub-option D2:** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

#### **4.4 Rebuilding Plan**

##### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

**I Support Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

##### **4.4.2 Rebuilding Plan Framework**

**I Support Option B:** 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 recruitment assumption specified in Amendment 7) 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.

##### **4.6.2 Management Program Equivalency (Conservation Equivalency)**

###### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

**I Support Sub-option B1-a:** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

###### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

**I Support Sub-option C3:** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

###### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

**I Support Sub-option D2:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

###### **Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

**I Support Sub-option E2:** the percent reduction/liberalization projected for the FMP

standard at the state-specific level.

Again, thank you all for your time. Please be part of the force that saves the striped bass fishery once and for all.

Sincerely, Nick Praver

**From:** [Rick Roy](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7  
**Date:** Tuesday, April 12, 2022 3:38:02 PM

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To whom it may concern,

I have run a six pack charter boat out of New London, Ct for many years. After surviving the past 2 years with a decreased amount of trips because of Covid, we are facing another dilemma, Striped Bass Amendment 7.

Harvesting striped bass should stay status quo for the for hire sector with out current slot limit. With the current slot limits, the large females are released unharmed by a professional crew using a simple j hook on for hire charter boats. On most of our trips, we would fish for striped bass and then move to bottom fishing for the remainder of our trip. This would put even less pressure on the striped bass.

We need this to effectively remain in business. Please consider this as an option before making a final decision on Striped Bass Amendment 7.

Thank you,

Capt. Richard Roy  
Marlintini Sportfishing Inc.

Sent from my iPad

**From:** [S Arnett](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, April 12, 2022 3:00:37 PM

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Dear Atlantic States Marine Fisheries Commission,

My name is Steve Arnett and I'm originally from mid-coast Maine. Though I now live out west I return home most summers to fish the Kennebec River estuary for striped bass. I have vivid memories from the mid-1990s of seeing large (36" plus) striped bass swimming under the wharf where the lobster boat I worked on was tied up. Over the years I've observed the number and size of striped bass decline. As I near retirement and my son's interest in fishing grows I look forward to spending more time in this exciting fishery. It is with those thoughts in mind that I write to you with my feedback on the Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass. My comments focus on sections 4.1 and 4.6.

From section 4.1 please do not allow deferred management action. There is no good reason in my mind to weaken any existing management trigger or to delay implementation of an action from a trigger. I would like to see the most conservative recruitment triggers and the quickest timeline feasible for any necessary rebuilding plan. To this end I support the following in section 4.1 sub-options A1, A2, B1, B2 and C1.

Section 4.6.2, Management Program Equivalency or Conservation Equivalency as it is currently used, seems like it allows for a disjointed effort towards managing the fishery rather than all states working in concert. The striped bass fishery spans the better part of the Atlantic sea coast with fish migrating along its length. Managing it as such makes sense. To that end I support the following from the draft plan sub-options; B1-a, C3, D2 and E2.

This is a challenging task to be sure but a sustainable, equitable approach to managing this important fishery is achievable. Thank you for the important work you do. I'll look forward to tracking this amendment through the process.

Respectfully,

Steve Arnett

From: [Mike Jones](#)  
To: [Comments](#); [Mike Jones](#)  
Subject: [External] Public Comment on Draft Amendment 7 to the Atlantic Striped Bass FMP  
Date: Tuesday, April 12, 2022 2:37:25 PM

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Emilie  
Franke  
April 12, 2022

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

Dear Emilie Franke ,

I submit these comments in response to the draft Amendment 7 Striped Bass management Plan. I have been an avid Striped Bass angler since 1970 and have seen the worst and the best with Striped Bass population and the management. The biggest difference between the late 70's and now are the number of interest groups pursuing the Striped Bass. I feel we need to be more proactive in the management of the Striped Bass or else we will surely succumb to another accelerated collapse of the fishery.

**Without a healthy resource, the socioeconomic impact is a moot point.  
Manage the Striped Bass for a healthy fishery and not the dollar sign.**

#### **4.1 Management Triggers**

##### ***Tier 1 Options: Fishing Mortality (F) Triggers***

I support **Sub-option A2**. implementing measures to achieve the Target within 2 years is reasonable.

- **Sub-option B1 (status quo)**
- **Sub-option C1 (status quo)**



## ***Tier 2 Options: Female Spawning Stock Biomass (SSB) Management Triggers***

I support **Option A2**. I feel delay has been an issue in striped bass management and two years is reasonable time to implement any management action.

<!--[if !supportLists]--> <!--[endif]-->Support **Option B1 (status quo)**

<!--[if !supportLists]--> <!--[endif]-->Support **Option C1 (status quo)**

## ***Tier 3 Options: Recruitment Triggers***

I support **Sub-option A3**... ASMFC to increase focus on recruitment triggers in management.

<!--[if !supportLists]--> <!--[endif]-->Support **Sub-option B2**

## ***Tier 4 Options: Deferred Management Action***

I strongly support **Option A (status quo)**: No Deferred Action.

## **4.2 Recreational Fishery Management Measures**

### **4.2.1 Size Limits, Bag Limit and Seasons**

**I support continued use of these management tools.**

### **4.2.2 Measures to Address Recreational Release Mortality**

**I support Option A** and urge ASMFC to continue the Addendum VI circle hook measures.

**I am opposed AT THIS TIME to Option B entirely** as I feel options for both Seasonal Closures & Spawning Closures for striped bass are underdeveloped and require improvement before more serious discussion and consideration. I encourage ASMFC to prioritize development of ways that both seasonal & spawning closures might be implemented in the future.

**I support Option C. Additional Gear Restrictions**

**I support Option C1** as is already the case in Massachusetts.

**I am opposed to Option C2.**

**I am Opposed to inclusion of Option D** in any way shape or form. Considering a 5 minute google search reveals all ASMFC members states have some sort of I&E program in place; this option is a waste of ASMFC staff time and resources.

### **4.3 Commercial Fishery Management Measures**

No comment

### **4.4 Rebuilding Plan**

#### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

**I support Option B.** To deny striped bass are in a low recruitment situation is bizarre and I feel the methods of calculation described in **option B** are needed at this time.

#### **4.4.2 Rebuilding Plan Framework**

I believe the striped bass stock is in worse shape than indicated in the analysis that justified launch of this Amendment. I anticipate the 2022 stock assessment will reveal continued decline in the stock and possibly recruitment failure. I support the idea that ASMFC needs to be ready to take swift action IF the assessment indicates recent actions have failed to prevent overfishing during significant decline in recruitment.

I am not in favor of preapproving actions without significant public input **HOWEVER** I feel the pending stock assessment may reveal an emergency situation and if that is the case, the decision to support **Option B** is easy.

### **4.6 Conservation Equivalency**

#### **4.6.2 Management Program Equivalency**

I strongly believe Conservation Equivalency (CE) Programs **should NOT be allowed** for striped bass.

Thank You for all you do for the Resource.

Mike Jones

Carver, Massachusetts.

**From:** [Anthony Durso](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment comments  
**Date:** Tuesday, April 12, 2022 2:26:00 PM

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I would like to agree with the plans proposals to have a 2 week closure from targeting striped bass. Also fishing should not take place in spawning rivers  
The current slot limit of 28 to 35 should stay in place  
Thank you  
Anthony Durso  
Long island new york

**From:** [Connor Lynch](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Comments on Amendment 7  
**Date:** Tuesday, April 12, 2022 2:19:48 PM

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Hi there,

My name is Connor Lynch. I'm an avid recreational fisherman who has a passion for fishing for Striped Bass. I travel up and down the coast fishing for these fish and am deeply concerned with the current stock assessments and the state of the fishery. I've noticed a significant decline in the fishery over the last several years, particularly in the Chesapeake Bay and its tributaries. I would like to take the following stances:

#### 4.1 Management Triggers

##### Tier 1: Fishing Mortality (F) Triggers

Support Sub-option A1 (status quo)

Support Sub-option B1 (status quo)

Support Sub-option C1 (status quo)

##### Tier 2: Spawning Stock Biomass (SSB) Triggers

Support Sub-option A2

Support Sub-option B1 (status quo)

Support Sub-option C1 (status quo)

##### Tier 3: Recruitment Triggers

Support Sub-option A2

Support Sub-option B2.

##### Tier 4: Deferred Management Action

Support Option A (status quo): No Deferred Management Action.

#### 4.2.2 Measures to Address Recreational Release Mortality

Support option A. SQ

Support an expanded and more developed option B2-a to include the entire coast, especially staging areas.

Support Sub-option C1

Support Sub-option C2.

Support Sub-option D2

#### 4.4 Rebuilding Plan

##### 4.4.1 Recruitment Assumption for Rebuilding Calculation

Support Option B

##### 4.4.2 Rebuilding Plan Framework

Support Option B

#### 4.6.2 Management Program Equivalency (Conservation Equivalency)

Support Sub-option B1-a

Support Sub-option C3

Support Sub-option D2

Support Sub-option E2

Please help us save these fish so future generations can enjoy them as much as we have been able to.

Thanks,

Connor

Sent from my iPhone

**From:** [George Apeldorn](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [HEATHER CORBETT](#); [Peter J. Clarke](#); [C. LOUIS BASSANO](#); [TOM FOTE](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, April 12, 2022 2:16:27 PM

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Dear ASMFC,

Striped bass fishing is very important to me, my family, and my community. I am a light tackle fisherman from Southern New Jersey who primarily focuses on striped bass. My family wants to enjoy a great experience on the water and we personally support catch and release for striped bass. I am the father of an eighteen year old young man who loves the water, boating, and fishing. I hope everyone can experience the same great striped bass fishing that I enjoyed growing up on the Jersey Coast.

While striped bass fishing has been very good the past few years in my local waters, I understand there is a coast wide issue. I support a responsible and precautionary management style with regulatory stability and reasonable access to the fishery.

I support the following:

Section 4.1 Management Triggers

Tier 1: Fishing Mortality (F) Triggers

Option A: Sub-option A1

Option B: Sub-option B1

Option C: Sub-option C1

Tier 2: Spawning Stock Biomass (SSB) Triggers

Option A: Sub-option A2

Option B: Sub-option B1

Option C: Sub-option C3

Tier 3: Recruitment Triggers

Option A: Sub-option A2

Option B: ASA's Variation of Sub-option B2

Tier 4: Deferred Mgmt Action

Option A: No Deferred Management Action

Section 4.2.2 Measures to address Recreational Release Mortality

Option B: Sub-option B2-a No Harvest Spawning Closure

Option C: Sub-option C1 & C2

Option D: Sub-option D1

4.4.1 Recruitment Assumption

Option B

4.4.2 Rebuilding Plan Framework

Option B

4.6.2 Management Program Equivalency

Option B: Sub-option B1-a & B1-c  
Option C: Sub-option C3

Option D: Sub-option D1  
Option E: Sub-option E2

Thanks,  
George Apeldorn

**From:** [Tom Weaver](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7 public comment input  
**Date:** Tuesday, April 12, 2022 1:29:53 PM

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Dear Sirs,

I am a full time professional Light Tackle Charter fishing captain in Annapolis Maryland, fishing in the Maryland portion of the Chesapeake Bay. The primary target species for my business is the Striped Bass and I would like to provide my position for your consideration on the following areas of the Draft Amendment 7

#### 4.6.2 Management Program Equivalency

Option B ; Restrict the use of CE based on stock status

I support SUB-option B1-a  
CE programs will not be considered when the stock is at or below the biomass threshold

Option C: Precision standards for MRIP used in CE proposals

I support option C3  
CE would not be able to use MRIP estimates with an PSE of more than 30%

Option D: CE uncertainty buffer for Non-Quota managed fisheries

I support Sub-option D2  
Proposed CE programs for non quota regulated fisheries would be required to include an uncertainty buffer of 25%

Best....Capt Tom

Captain Tom Weaver  
Fish with Weaver  
317 Chester Avenue  
Annapolis, MD 21403  
410 533 0928



**From:** [JPM](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Striped Bass Amendment 7  
**Date:** Tuesday, April 12, 2022 1:18:26 PM

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You can't hide the numbers and you can't hide from the numbers...it's time for a recreational AND commercial moratorium until this species recovers and established scientific benchmarks are re-established.

Until then, my recreational fishing money is being redirected to other species in other states.

Capt Jeff Minderlein

**From:** [Kyle Gronostajski](#)  
**To:** [Comments](#)  
**Cc:** [TOM FOTE](#); [C. LOUIS BASSANO](#); [HEATHER CORBETT](#); [Peter J. Clarke](#)  
**Subject:** [External] Amendment 7  
**Date:** Tuesday, April 12, 2022 12:57:52 PM

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To all concerned parties,

Thank you for the opportunity to comment on the Draft Amendment 7. As an avid recreational fisherman and dedicated professional in the environmental and conservation nonprofit field I'd like to submit my comments regarding the numerous options available before the ASMFC in hopes of preserving and restoring this valuable resource for future generations.

Striped bass numbers are in peril and changes must be made to facilitate a rebound before the stock hits an even more critical point.

For those reasons I am in support of the following:

***4.1 Management Triggers:***

*Tier 1: Fishing Mortality (F) Triggers*

Option A: Sub-option A1

Option B: Sub-option B1

Option C: Sub-option C1

*Tier 2: Spawning Stock (SSB) Biomass Triggers*

Option A: Sub-option A2

Option B: Sub-option B1

Option C: Sub-option C1

*Tier 3: Recruitment Triggers*

Option A: Sub-option A2

Option B: Sub-option B2

*Tier 4: Deferred Management Plan*

Option A: Option A

***4.2.2 Measures to Reduce Recreational Release Mortality***

Option C: Sub-option C1 and C2

Option D: Sub-option D2

***4.4.1 Recruitment Assumption for Rebuilding Calculation***

Option B: Option B

***4.4.2 Rebuilding Plan Framework***

Option B: Option B

***4.6.2 Management Program Equivalency***

Option B: Option B1-a

Option C: Sub-option C3

Option D: Sub-option D2

Option E: Sub-option E2

Each of these options selected ultimately works to promote best practices and work in a prompt and timely manner to address the needs of the striped bass. Should any of these triggers occur action must be taken using the best data available. Waiting and acting after the fact will only damage the stock further and draw out the process of rebounding this stock.

Striped bass are too valuable to East Coast anglers, businesses, and the environment to be neglected and left to face dwindling numbers.

Thank you for your time.  
Kyle Gronostajski

--  
Kyle Gronostajski

609-977-5042

[kgronostajski@gmail.com](mailto:kgronostajski@gmail.com)

**From:** [John Mitchell](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, April 12, 2022 12:56:26 PM

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To whom it may concern,

Here's my input

1 No closures option B1-A & B1-B

Remove some of the seals first

2 Inform Rec. fishers the time it takes

To hold your breath is the time the fish must be returned ( chill out on photo opps.

3 What about raising stripers like, trout,salmon,sturgeon in salt water tanks ?

4 All states to adopt a min. size & a max size throughout.

5. Are fish being counted that go beyond the 3 miles due to the pressure being put on them from seals, boats, rec. fishing & trawler's, pollution from waste water from Plymouth nuke plant ?

Sent from my iPhone

**From:** [Luis Tirado](#)  
**To:** [Comments](#); [Stephen Train](#); [Rep. JAY MCCREIGHT](#); [Megan Ware](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Tuesday, April 12, 2022 12:40:03 PM

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Dear Commissioners,

I am writing to you regarding Amendment 7, and all it entails. I have fished for Striped Bass for 33 years, I have seen how good it can be, and I see where it is today. What I see today is not acceptable, and I want to see change. I want to see the fishery managed for abundance. It is my hope that I can see this fishery bounce back to the levels it was once at, so that I may enjoy it with future customers, my children, and future grandchildren.

As far as the document goes, here are my stances:

Management Triggers, Tier 1: I support sub option A1

Option B: I support sub option B1

Option C: I support sub option c1

SSB Triggers

Option A: I support sub option A2

Option B : I support sub option B1

Option C: I support sub option C1

Recruitment

Option A: I support sub option A2

Option B: I support sub option B2

Deferred Management

I support Option A

Released Mortality

Option C: I support sub option C1 and sub option C2

Outreach Education

I support sub option D2

Rebuilding Plan 4.4.1

I support Option B

4.4.2

I support option B

C.E.

I support sub option B1a

Option C: I support sub option C3

Option D: I support sub option D2

Option E: I support sub option E2

So there it is, Amendment 7 broken down and what I want to see the board do. I appreciate the efforts of this extremely large and complex document by all of those involved. I will once again ask you to do what is best for the fishery. I want to be able to enjoy this resource for decades to come.

Respectfully,

Captain Lou Tirado  
Diamond Pass Outfitters  
9 Delaware Ave  
South Portland, ME 04106  
207-899-5985

fullsizeoutput\_2308.jpeg



**From:** [Bob Burger](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment 7  
**Date:** Tuesday, April 12, 2022 11:40:12 AM

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Hello

I am a recreational fisherman from Connecticut. Striped bass have been my primary target species for 15 years- up until 2017 when the fishing became so poor that I gave up targeting them. I didn't want to be part of the problem- that is, too few fish and too many people trying to catch them. Since then I have participated in many meetings to try and get conservation/rebuilding measures passed so the fishery can one day be restored.

As such- please vote to make these changes with Amendment 7. The fishery should be managed for abundance so that fishing public can access and enjoy them. It should provide for mandatory rebuilding measures within a short, reasonable timeframe if stock numbers fall below the threshold.

This Amendment will likely be the management tool in place until after I die- please choose to vote for conservation

Thank you

Bob Burger  
109 High Meadow Rd  
Guilford CT  
06437

**From:** [Thomas Guarino](#)  
**To:** [Comments](#)  
**Subject:** [External] Comments for Amendment 7  
**Date:** Tuesday, April 12, 2022 11:29:53 AM

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ASMFC,

Hi my name is Thomas Guarino, I am an avid recreation fisherman from Maryland, but travel up and down the east coast pursuing Striped Bass as well as other fish. These are my comments for Amendment 7 for Striped Bass Advisory. Please do what is right to recover the Striped Bass as fast as possible. I am in favor and support of the following:

4.1-

Tier 1: A1, B1, C1

Tier 2: A2, B1, C1

Tier 3: A2, B2

Tier 4: A

4.2-

B-None

C1, C2

D2

4.4.1-

Option B

4.4.2-

Option B

4.6.2-

B1- a

C3

D2

E2

Thank you.

Thomas Guarino  
Maryland



**From:** [Patrick Hay](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [Eric Reid](#); [Sen. Susan Sosnowski](#); [DAVID BORDEN](#); [Jason E. Mcnamee](#); [KURT BLANCHARD](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, April 12, 2022 11:26:16 AM

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April 12, 2022

Emilie Franke

Fishery Management Plan Coordinator

Atlantic States Marine Fisheries Commission

[1050 North Highland Street, Suite 200A-N](#)

[Arlington, Virginia 22201](#)

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board:

I am writing you to provide comments on the Interstate Fishery Management Plan for Atlantic Striped Bass Amendment 7.

I am an active recreational angler that has been fishing the waters of Rhode Island and Massachusetts for over 3 decades. Over that period, I have seen the benefits of management of Striped Bass. There were times in my youth that it was nearly impossible to catch these fish recreationally within Narragansett Bay. Thanks to both environmental and fisheries regulations I have seen vast improvement in the recreational fishery. The critical comment that I want to make is that this species has a tremendous economic impact as recreational fishery. As a game fish the Striped Bass is a valuable resource that must be protected. I do not want to see a time that we revert to the low levels of juvenile fish that we have seen in the past and this mean that not only local measures need to be taken but measures that impact the full migration and breeding areas of the Striped Bass.

I am currently in the process of working to obtain my captains licensing in the hope that I can someday work in my retirement as a charter captain. This mean that we must protect these fish and that we need to take the appropriate and necessary actions to ensure these fish are here for generations to come. The board has taken steps to ensure this over the past decade however, it seems that the actions take are often to late to have the intended impact or that the actions are not executed properly.

The other area that I wanted to address was recreational accountability. Although commercial accountability is a realistic and obtainable objective the recreational accountability is somewhat harder to implement. I agree that there must be accountability, but this is a very complicated issue and that I believe that resources and efforts can better be placed on improving the mortality rate of recreationally released fish. As I often see may anglers are not educated on how to handle a fish or release a fish to ensure that fish survives or has a high probability of survival. I believe that more efforts should be put into education of anglers.

I thank you for the opportunity to provide some insight into Amendment 7 and I look forward to seeing what the actions for the board will be to protect this vital natural resource.

Sincerely,

Patrick Hay

[30 Scott Drive Riverside, RI 02915](#)

[Phay6229@gmail.com](mailto:Phay6229@gmail.com)

**From:** [Alex Palfrey](#)  
**To:** [Comments](#)  
**Cc:** [Michael Armstrong](#); [Dan Mckiernan](#); [Raymond Kane](#); [Rep. Sarah K. Peake](#); [LOWELL WHITNEY](#); [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, April 12, 2022 11:13:54 AM

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Hi ASMFC,

My name is Alex, I'm 27 years old and have grown up fishing for stripers out of the Duxbury/Boston area for 20+ years as a catch & release angler. I spend close to 100 days on the water a year, and have seen first hand the striper population strength ebb and flow over the past two decades. I'm writing about the Amendment 7 proposition to **express my support for ASGA's position** because I highly value the continued strength and survival of New England's striper fishery, and want proactive and effective measures implemented.

**Action Items:**

- **Adjust the CE management tool to make it effective.** Add in the following guardrails: 1) No CE allowed when striped bass are overfished 2) Data must be high quality, and <30% SE or less. 3) Add in a 25% Uncertainty buffer
- **4.4.2 Option B;** to use data-driven, proactive management rather than wait for further delays
- **Do not issue seasonal closures.** The non-date driven effect is unknown, for a frustrating and invasive action.
- **I agree with ASGA's positions on other questions as well,** but exclude them here for brevity
- **Consider further stakeholder outreach and a 'layman's explanations' of the issues.** These are hard & complex topics for people to understand without digging deep into a 149pg document.
- **Eventually, I hope the fishery can become fully catch and release** in the future to rebuild the vulnerable fish stocks, but understand the importance of making these Amendment 7 changes today.

Just as my dad taught me to striper fish when I was a child, I want there to be a healthy striper fishery available in the coming decades when I share this great sport and hobby with my children. In the meantime, the economic value of the striper fishery to the MA economy is significant; anecdotally I spend thousands of dollars each year directly at mom & pop tackle stores, charter trips, and fuel around the MA area.

I'll be watching this outcome closely in the coming months, please make conservative choices for the health of this fishery.

Thank you,  
Alex Palfrey

**From:** [Parker Gerrish](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Tuesday, April 12, 2022 11:02:42 AM

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Good Morning,

I first would like to commend the Maine DMR on their wonderful job of the public hearing and breakdown of each portion of the issue at hand.

I support the following:

Tier 1: Option A, Sub-option A1.

Tier 2: Option A, Sub-option A2

Tier 3: Option B, Sub-option B2

Tier 4 : Option A & Sub-options C1 & C2 (even though they do not apply to me up here in Maine I see their value in the southern fisheries.

4.4.2 Option B, I would like to see fast action based off the 2022 data.

4.6.2 Option C, Sub-option C3. Conservation Equivalency is a scary thing to have in this dire fishery currently.

Thank you and I hope you make the right decisions for this fishery's future!

-Parker Gerrish

**From:** [Chris Aubut](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Tuesday, April 12, 2022 10:56:42 AM

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Massachusetts Striped Bass Board Members

Mike Armstrong  
Rep Sarah Peake  
Lowell Whitney  
Dan Mckiernan  
Raymond Kayne

Good Morning,

My name is Chris Aubut. I am a full time sport fishing industry professional. I started a saltwater fly fishing charter business in April of 1996 in my home town of Westport MA. This was a fantastic time to be an angler in New England. The fishery was thriving and there were reliably large schools of striped bass where we would expect them to be. The coastal rivers and salt ponds fished well in the early season from mid April until the second week of June. In this time we would expect the fish to gradually increase in size as the water warmed. Large Schools of fish could be witnessed migrating at the entrance of Buzzards Bay and Vineyard Sound. On some days there would be fish feeding on the surface in every direction for as far as the eye could see.

I think the important thing to consider about this time mentioned above in the history of the striped bass was strict rules in place to protect the fish leading up to their recovery. I am 48 years old and spent time fishing with family and friends most days of my childhood in season. I did not catch a striped bass until I was 11 or 12 years old as we caught Bluefish and also enjoyed the freshwater fishery in Massachusetts during the time prior to the striped bass recovery. Striped Bass were not available to catch, the stock of fish had been decimated but the efforts put forth brought the fish back in great numbers in the mid 1990s. I witnessed and lived this first hand. I believe that with some concern for the fishery on both sides of the tabel great things can be achieved as they were in the past.

I currently own a fishing rod manufacturing business that I started after my guiding career in 2011. I am not on the water as much as my peers as the workload that I have does not allow the free time to be out on the water. I do communicate with many in the sport fishing community and I am able to spend 6-10 days on the water during the season.

I believe that we are all presented with a particular set of challenges. Information sharing is instant in today's world. In the past the skills it took to catch fish were learned over time by spending time on the water. Today someone can simply google how to approach a certain fishing/angling situation and have all the information needed to be productive and shave years off of the learning curve. This is good and bad as there is more pressure on the fish than I have ever seen. Some days there are 100 boats or anglers shoulder to shoulder on the shoreline catching striped bass as the fish are simply trying to migrate or settle into their summer homes. Facebook and Instagram are tough on the fish as once a fish caught picture is posted the fish in that location will see more pressure than they would have otherwise. The good thing is that we can just as easily communicate how to handle and release fish and put our efforts toward only taking what we need or would actually eat. As a whole it would be great if we could all respect

the resource so that future generations could have an opportunity to enjoy a healthy fishery.

Other thoughts to consider are radar and the fish finding equipment found on the boats of today. Birds can easily be found with Radar. Terns, gulls, gannets, shearwaters and petrels tell us as anglers the presence of baitfish. With baitfish we know that the predators aren't far behind. This makes finding areas of life outside of eyesight on the water easy to locate. The depth sounders/fish finders today give detailed images of what is below and on the side of the boat depending on what transducer you choose, this also makes finding schools of fish much easier and as anglers stay on top of longer. When I have the opportunity to get out on the water I notice the amount of moored boats in areas where fisheries used to thrive and find that the fish now prefer other areas during the same time of season. I notice the lack of grass on the bottom of the rivers, bays and salt ponds. I am unsure of the root cause of the lack of grass but it is an important part of the fishery as it is a place where predators can ambush their prey. Many of the crustaceans and bait fish that the predators feed on once called these areas home.

Some of my comments above may be unpopular. My intention is to get everyone involved to think differently. I do not believe it is realistic to completely leave the fish alone. I do believe that with the changes in technology and communication that conservation may need to be looked at differently knowing that there are more people than I am aware of enjoying the fishery over anytime in the past. The fish are easier to find and it is easier to communicate where they are and how to catch them. I do believe we can work together across all of the states that the fish migrate through to secure a vibrant fishery and the future stocks of striped bass. I do see reason for concern and I hope that everyone can work together to try to regain balance in the very fragile inshore and near offshore ecosystem that supports the life of the many plants and animals involved.

I am available for questions and I hope that my comments are helpful.

Best Regards,

Christopher J. Aubut  
215 Elm Street  
Duxbury, MA 02332  
(305) 797-5442  
[www.aubutrods.com](http://www.aubutrods.com)

**From:** [John Moy](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, April 12, 2022 10:48:26 AM

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Dear Sirs:

Here are my comments on the Draft Amendment 7 of the Striped Bass management plan. I am a recreational angler that does almost all of his striped bass fishing in Nantucket MA. I also participate in Massachusetts's angler Data Collection Team (SADCT). I can definitely say that every year the striped bass are getting fewer and smaller. Whatever we have been doing has not been working. And if we don't figure it out soon, it seems like we are heading for another striped bass moratorium like in the 1980s.

I am not a fisheries management biologist so I can't comment on all the nitty gritty details of the amendment. Instead I would like to make a couple of overall points:

1. Spawning Area closures. Not only should harvest be outlawed in spawning areas, but catch and release should also be prohibited. I know that you can't prevent people from accidentally hooking the spawning fish. But you can post the areas explaining that the fish must be returned to the water immediately, and how to handle them correctly. Also, you should require the use of barbless hooks (circle hook for bait) in these areas regardless of what people are fishing for. And there should be enforcement in these areas too.
2. Conservation Equivalencies. There should be none for a species like striped bass that is in peril. These are simply loopholes for states that want to exceed their quotas.
3. Education. States should do a better job teaching anglers proper fish handling techniques, and informing anglers of the fishing regulations. Also more enforcement is necessary.

Thank you for your consideration.

John Moy  
25 Eel Point Road  
Nantucket, MA 02554  
[jmoy@ospf.org](mailto:jmoy@ospf.org)  
617-784-1872

**From:** [garrym@optonline.net](mailto:garrym@optonline.net)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass PID  
**Date:** Tuesday, April 12, 2022 10:38:13 AM

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April 12, 2022

Emilie Franke

Fishery Management Plan Coordinator

Atlantic States Marine Fisheries Commission

1050 North Highland Street

Suite 200A-N Arlington, Virginia 22201

[comments@asmfc.org](mailto:comments@asmfc.org)

Subject: Striped Bass PID/ Amendment 7

Dear Ms. Franke,

Thanks for the opportunity to comment . The following are my selected options from the Public Information Document:

Tier 1 – Timeline to Reduce F to Target

Sub Option A1

Sub Option B1

Sub Option C1

Tier 2 – SSB Triggers

Sub Option A2

Sub Option B1

Sub Option C1

Tier 3 – Recruitment Triggers

Sub Option A2

Sub Option B2

Tier 4 – Deferred Management Action

Option A

Recreational Management Measures

Option B2-a

Sub Option C-1

Option D2

Rebuilding Plan

Option B

Rebuilding Plan Framework

Option B

Management Program Equivalency

Option B1-a

Option C

Option D2.

Sincerely,

Garrett Moore

28 Palm Lane

Westbury, NY 11590



**From:** [Joel Stoehr](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Tuesday, April 12, 2022 10:15:22 AM

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April 12, 2022

To the Atlantic States Marine Fisheries Commission,

Striped Bass populations and spawning stock biomass are down... we need to act now. Striper stocks are currently overfished. Because of this fact, it is incumbent upon the ASMFC Board to act when triggers are tripped and not postpone taking actions that could help to rebuild the striped bass population. I strongly urge you to act to reduce fish mortality within one year, do not delay.

Many of us have noticed the scarcity of striped bass up and down the East Coast over the past 10 years. Fish are getting smaller, and there are less of the 30-36 inch size fish around. Fishing should be productive coast wide, not limited to a small number of spring and fall hotspots as it is now. I urge you to take actions that will manage this resource **for abundance**. It would be wonderful to bring back the great fishing that we previously enjoyed in the 1990's to early 2000's. I can't speak as a scientist could to what measures would be the most effective, but I do support shifting the slot size to one fish at/over 36" and under 40" (and only one fish for all anglers regardless of how, where, or with whom they fish) or better yet, making the striper a game fish. Big stripers are not "good eating" and small stripers should be allowed to breed **more than once** before graduating into the regulation "keeper" size. I worry that we have not acted fast enough to save the 2015 year class, and they will be decimated this coming season as they become 28 inches and grow into legal size to harvest. We do not have other strong year classes to rely on.

I do not support "conservation equivalency" -this is a misguided strategy and a selfish excuse for some states to find a way to kill more fish. I strongly support coast wide management of striped bass and doing whatever it takes to bring the striper population back so that it will be a fishing resource for lifetimes to come. Striped bass fishermen and their families support coastal communities, increase tourism, and spend money in restaurants, bars, hotels, and stores. Imagine the economic impact that would result from North Carolina to Maine if we failed to rescue and safeguard this resource for the future. It is a shame that the actions of certain states are throwing the future of this species into jeopardy.

I understand recreational release mortality, and I believe we could do more to educate the public on best practices such as banning treble hooks, "keeping fish wet" and going barbless. We endorse "artificial only" methods for freshwater species such as trout, should we consider the same for the striped bass? I do not support out-of-season targeting of striped bass: we should protect breeding fish, and give fish "time off" from the fishermen. I do, however, believe that we can rebuild the striper stocks while still allowing for recreational and commercial fishing to continue. I do not support in-season "no targeting" closures to the fishery as a management strategy.

I am not using the section letters and headings in the Draft Amendment 7, but I believe you can read what I am advocating for in this letter and apply this to make sound management decisions based upon what I value as a recreational angler. Thank you for taking the time to read this letter and consider my comments as a passionate recreational angler and lover of striped bass.

Save the Striped Bass!  
Joel Stoehr

--

**Joel Stoehr**

*Assistant Professor of Design*

*Director BFA Product Design*

**School of Constructed Environments**

**Parsons School of Design**

[www.joelstoehr.com](http://www.joelstoehr.com)

**From:** [Christopher Kline](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] My comments on Striped Bass Amendment 7  
**Date:** Tuesday, April 12, 2022 10:06:19 AM

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To the ASMFC:

Hello. I am Christopher Kline, from Quincy Massachusetts. I would like to submit my thoughts and preferences in response to the request for public comment on Amendment 7 for striped bass management.

I have been fishing since I was a small child, at first freshwater fishing in upstate NY, and then in the oceans of MA and RI. Striped Bass fishing is incredibly important both to me personally, and also to our states economically. For example, I alone spend at least \$5,000 per year on fishing equipment, charter trips, food and lodging while traveling for fishing, organization memberships, etc. I pay taxes and pay for my fishing license religiously. While I do harvest a few fish every season for my family, I also take care to practice good catch and release practices to help the fishery.

Proper management of the fishery and rebuilding of the striped bass population ASAP is very important to me. **ASMFC, please do whatever it takes to end overfishing as fast as possible, and to manage for abundance and not yield!**

After careful consideration of this complex issue, the option I would choose for each of the proposed regulations is as follows:

#### **4.1**

Tier 1

- A1
- B1
- C1

Tier 2

- A2
- B1
- C1

Tier 3

- A2

- B2

Tier 4

- A

## 4.2

- B- None
- C1, C2
- D1

### 4.4.1

- B

### 4.4.2

- B

### 4.6.2

- B1-a
- C3
- D3
- E2 -- New Jersey harvests a grossly disproportionate number of striped bass.

Thank you for listening.

Sincerely,

Christopher Kline

44 Forbes Hill Road, Quincy MA 02170

617-233-5169

**From:** [Jacob Bialk](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass  
**Date:** Tuesday, April 12, 2022 10:01:18 AM

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Either another moratorium needs to be put in place or we need to follow the rules we put in place for our RED DRUM. Anything over 28 inches needs to be released so they can spawn. This shall include everywhere striped bass are located. PLEASE LETS BE PROACTIVE AND SAVE THESE FISH!

Capt. Jacob Bialk  
Chesapeake Bay - Florida Keys

**From:** [wildimento@verizon.net](mailto:wildimento@verizon.net)  
**To:** [Comments](#)  
**Subject:** [External] Comment for Amendment 7  
**Date:** Tuesday, April 12, 2022 9:54:55 AM

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My name is Will DiMento and I am an avid surfcaster from the state of Massachusetts. I've been a fisherman since I was 3 years old. Striped bass have played such an enormous role in my life, keeping me outdoors and involved in a life long passion that I soon hope to start enjoying with my 2 year old son. I could not wait to get my first boat in the mid 1990's when I turned 12, my brother and I would chase schoolies all day long for most of the summer. This evolved into spending more money on boats, gear and eventually head over heels into surfcasting. My crew takes multiple fishing vacations per season, often to Rhode Island, the Cape, Block Island and beyond. The passion and joy that I get out of chasing striped bass is immeasurable. Catching and releasing these fish to let them grow for the next generation far outweighs any value they bring to the dinner table as we release 100% of all striped bass we catch. I really hope in the future that the stocks can be allowed to rebound so my son can enjoy a lifetime of chasing these fish as I plan on doing for the next 40+ years.

Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Will DiMento

Rowley, Massachusetts

Email: [wilddimento@verizon.net](mailto:wilddimento@verizon.net)

**From:** [James Ferguson](#)  
**To:** [Comments](#); [Dan Mckiernan](#); [Raymond Kane](#); [Sarah.Peake@mahouse.gov](mailto:Sarah.Peake@mahouse.gov)  
**Subject:** [External] Amendment 7  
**Date:** Tuesday, April 12, 2022 9:35:40 AM

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To whom it may concern,

My name is James Ferguson and I am a resident of Newbury MA. I grew up in Newburyport and then the Newbury portion of Plum Island.

I am very concerned with the current state and trends of the Striped Bass Fishery. I believe the ASMFC needs to take urgent action to improve this fishery.

I am a dedicated recreational fisherman and love our natural resources here in Massachusetts like the Striped Bass. I spend weeks and hours upon hours striper fishing and am very concerned about their recent decline and think the ASMFC needs to take urgent action to improve and re-grow the fishery. I fish from Maine to Montauk and love especially the Plum Island and Cape Ann Area and the Cape Cod Canal. Fishing is a beautiful activity for many and we must protect this species. I have so much fun catching striped bass and my networks all conclude its been getting harder and more frustrating over recent years with the decline of the striped bass population.

I am concerned about the poaching on the back shore of Gloucester and also the Cape Cod Canal especially.

I remember catching many more Striped Bass in the early 2000's and nineties, even a few years ago the population was stronger.

We must take more action to protect the Striped Bass.

Here are my comments on the individual tiers/options of the proposed Amendment 7. The options I support are marked bold.

#### 4.1 MANAGEMENT TRIGGERS

##### *Tier 1: Fishing Mortality (F) Management*

*Triggers* Option A: Timeline to Reduce F to the

Target **Support sub-option A1 (status quo)**

Option B: F Threshold Triggers

**Support sub-option B1 (status quo)**

Option C: F Target Triggers

**Support sub-option C1 (status quo)**

##### *TIER 2: Female Spawning Stock Biomass (SSB) Management*

*Triggers* Option A: Deadline to Implement a Rebuilding Plan

**Support sub-option A2**

Option B: SSB Threshold Trigger

**Support sub-option B1 (status quo)**

Option C: SSB Target Trigger

**Support sub-option C1 (status quo)**

##### *TIER 3: Recruitment Triggers*

Option A: Recruitment Trigger Definition

**Support sub-option A2**

Option B: Management Response to Recruitment Trigger

**Support sub-option B2**

##### *TIER 4: Deferred Management Action*



**Support option A (status quo)**

*4.2 RECREATIONAL FISHERY MANAGEMENT MEASURES*

Option B. Effort Controls (Seasonal Closures)

**Support sub-option B2**

Option C. Additional Gear Restrictions

**Support sub-option C1**

**Support sub-option C2**

Option D. Outreach and Education

**Support sub-option D1**

*4.4 REBUILDING PLAN*

4.4.1 Recruitment Assumption for Rebuilding Calculation

**Support option B**

4.4.2 Rebuilding Plan

Framework **Support option B**

*4.6 ALTERNATIVE STATE MANAGEMENT REGIMES*

4.6.2 Management Program Equivalency

Option B. Restrict the Use of Conservation Equivalency Based on Stock Status

**Support sub-option B1-a**

Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals

**Support sub-option C3**

Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries

**Support sub-option D3**

Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries

**Support sub-option E2**

Thank you for the opportunity to comment. I hope that my voice will be heard.

Sincerely,

James Ferguson  
Newbury, MA

**From:** [Gregory Snow](#)  
**To:** [Comments](#)  
**Subject:** [External] "Draft Amendment 7."  
**Date:** Tuesday, April 12, 2022 8:34:05 AM

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To whom it may concern, I have been a fly fishing/light tackle charter Capt. In Rhode Island and more specifically....Block Island since 2000. The population of Striped Bass and even now Bluefish have dramatically dropped in the last 8 years plus. These gamefish are vital to the local economy! I stand with the ASGA on Amendment 7. We will see 1980 all over again if we aren't pro active on this matter. Thank You for time.....

--

**Capt. Greg Snow**

[www.snowflycharters.com](http://www.snowflycharters.com)

**Fly Fishing and Light Tackle Guide Service**

Block Island, Rhode Island

23' Sea Craft

"It's all about ripping tides and screaming reels"

**From:** [M.B](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Tuesday, April 12, 2022 8:09:52 AM

---

The time is now for the greed of humans to stop . You have the power to change the outcome of the Striped bass future and yet we are still Having meetings to decide.... It's obvious the fish are in decline, shut it down for a few years. Mike Baker  
kayakfishnewengland.com

Sent from my iPhone

**From:** [jseychell \(null\)](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment 7  
**Date:** Tuesday, April 12, 2022 7:30:20 AM

---

I dont understand why we have CE, or why we are waiting to rebuild. Please push harder for conservation.

Thanks  
Joe

**From:** [Emmons Whited](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, April 12, 2022 6:47:05 AM

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Hi, my name is Emmons Whited and I'm a 17 year old out of South Portland, Maine.

Although I'm only entering my 3rd season of seriously fishing for striped bass, the love that I have for these fish is unbelievable. And I expect that love to continue. But if these amazing fish are not around, due to overfishing, recreational mortality rate, and other factors, that love will not be around either.

As you know, striper have rebounded before. And now, with so much public support, it can happen again. Maybe even permanently.

I hope that these fish are always a constant in my life. Good policies and this amendment will help hugely in that hope.

Thank you, Emmons Whited

**From:** [Greg Cudnik](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7 Public Comment  
**Date:** Tuesday, April 12, 2022 2:46:07 AM

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Dear ASMFC,

A robust striped bass fishery is very important to me, my family, my businesses and community. I am a light tackle fishing guide from Central New Jersey who primarily focuses on striped bass. While sometimes keeping a fish here and there, most of my clients want to enjoy a great experience on the water and support catch and release. I am the general manager at Fisherman's Headquarters, a bait and tackle shop that was established in 1962 which currently employs 22 full time year round staff. I am also the father of a two year old boy who loves the water, the beach, the boat and fish. I hope he can experience the same great striped bass fishing that I enjoyed growing up on the Jersey Coast.

Living in a fishy shore community on a barrier Island (Long Beach Island) striped bass fishing has a rich history and is the way of life here. When the bass are running the community is vibrant. Everything from hotels, restaurants, marinas, convenience stores, gas stations, tackle shops and other small businesses are busy and the local economy is strong. Anglers come from far and wide to enjoy a day/weekend/week/month on the Island fishing the beaches and boats. The trickle down spending radiates from the striped bass economic engine.

While striped bass fishing has been really very good the past few years in my local waters and elsewhere in my state, I understand there is a coast wide issue. I'm curious to learn more about the results of 2020's 18% reduction as well as other news on the striped bass stock when the new stock assessment will be coming later this year.

I support a responsible and precautionary management style with regulatory stability and reasonable access to the fishery.

I support the following...

#### Section 4.1 Management Triggers

##### Tier 1: Fishing Mortality (F) Triggers

- Option A: Sub-option A1
- Option B: Sub-option B1
- Option C: Sub-option C1

##### Tier 2: Spawning Stock Biomass (SSB) Triggers

- Option A: Sub-option A2
- Option B: Sub-option B1
- Option C: Sub-option C3

##### Tier 3: Recruitment Triggers

- Option A: Sub-option A2
- Option B: ASA's Variation of Sub-option B2

Tier 4: Deferred Mgmt Action  
Option A: No Deferred Management Action

Section 4.2.2 Measures to address Recreational Release Mortality

Option B: Sub-option B2-a No Harvest Spawning Closure

Option C: Sub-option C1 & C2

Option D: Sub-option D1

4.3 Commercial Fishery Mgmt Measures

*I know this isn't the time or place however it must be stated that striped bass are exponentially more valuable as a game fish. Now's the time for striped bass coast wide game fish status.*

4.4.1 Recruitment Assumption

Option B

4.4.2 Rebuilding Plan Framework

Option B

4.6.2 Management Program Equivalency

Option B: Sub-option B1-a & B1-c

Option C: Sub-option C3

Option D: Sub-option D1

Option E: Sub-option E2

Regards,

Captain Greg Cudnik

[Fisherman's Headquarters Inc.](#)

280 West 9th Street

Ship Bottom, NJ 08008

C: 609.713.9299

**From:** [Anthony Vitti](#)  
**To:** [Comments](#)  
**Subject:** [External] My thoughts on striped bass  
**Date:** Monday, April 11, 2022 11:11:18 PM

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You all hear enough about technical opinion and detail oriented regurgitation on what people like me believe is or isn't appropriate fisheries management. I'm not here to tell you how to do your job, regardless whether I agree or disagree with your style and decisions regarding striped bass management, I think two things are worth acknowledging. Over fishing has been and is occurring and finding a balance that satisfies everyone is challenging when reputation and outcome are so publicly on the line. Whether or not that matters, the fact of the matter is striped bass are over fished and in ever more unquantifiable ways, they continue to be subject to both release mortality by ever changing numbers of recreational anglers, as well as commercial bycatch coastwide that also go largely unreported. With the explosion in coastal population, participants and overall removals....airing on the side of protecting these fish now will increase their financial value and impact on economies long term by virtue of their long term health and -availability- to EVERYONE who appreciate or depend on them. If the end justifies the means, then let the end be a wonderful recovery of the fishery where all can pursue these fish with the reckless abandon we all want. Gone will be the days when regulation limited commercial take or recreational participation. When only a few, strict, regulatory years can have such a beneficial impact on the future of everyone who depend on these fish, don't miss this moment to do what's right and do everything in your power to protect these fish from everyone.....so that everyone can enjoy these fish for decades to come when FORGOTTEN will be this moment of needed regulation, but APPRECIATED will be your actions to sustain the thing we all depend on. The choice is yours and won't be forgotten, for better or worse.

Thank you for your time

[Sent from Yahoo Mail on Android](#)



**From:** [Mark Lentine](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 stripe bass  
**Date:** Monday, April 11, 2022 10:32:33 PM

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Let's state the obvious and why the bass are in trouble. Over fishing, plain and simple whether it be by rec guys, party boats or commercial ships. The big difference between the three is money, rec guy isn't getting paid to catch fish the other two are. One party boat haul will kill more bass in one trip than I can fishing from a beach in my life time. I'm strictly C&R and all my bass swim away strong, I can't say that for every rec surf guy but I would say most. Maybe it's time to make a coastal rule on what one can take size and amount. How about zero fishing in spawning ground like the Housey in CT from January 1st to say June. Holdover bass need time to just be left alone. Maybe commercial vessels and party boats should be stopped from fishing for lengthy periods of time. Reducing their haul would be great they can find jobs doing something else. A fish that is released has a much better chance of survival than a fish in a cooler waiting for the trophy picture on a dock somewhere then off to the dumpster. Let's face it all the commercial and party boat guys do is catch/kill the end. Stricter penalties on poachers are also needed not just a slap on the wrist. Real penalties \$\$\$\$ large fines, put a automatic money withdrawal on the pay. Get ID info, ticket them, take all their gear and get money directly removed from there pay weekly. Let's get to getting or let's just have a moratorium for a few years and let's call it a day.

Sincerely  
Mark Lentine

--

Sent from Gmail Mobile

**From:** [Michael Dangredo](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 comment  
**Date:** Monday, April 11, 2022 9:35:44 PM

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Thank you for the opportunity to comment on this issue.

I strongly feel that there should be no Stripers kept. Keep a limited amount for commercial fishermen but recreationally, have no allowable keepers for a period necessary to revive the population. (3 – 5 years)

We will survive!!! and appreciate what was done to save the sport.

**Michael Dangredo**

*Finishing Touch Hardwood Floor & Remodeling CO.*

**13 Oak Ridge dr.**

**Charlton, MA. 01507**

**508-248-4224**



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**From:** [Ben Scott](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Monday, April 11, 2022 9:26:47 PM

---

April 11, 2022  
Emilie Franke  
Fishery Management Plan Coordinator  
Atlantic States Marine Fisheries Commission  
1050 North Highland Street, Suite 200A-N  
Arlington, Virginia 22201

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board (Board):

I would like to thank you for the opportunity to comment on Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass.

I strongly urge the Board to take decisive action to rebuild the striped bass fishery and establish management reforms that position the Atlantic striped bass stock for long-term abundance and stability. The need for action is critical given that spawning stock biomass is at a 25-year low and that the three most recent young-of-year indices in upper Chesapeake Bay are among the lowest on record. While the draft amendment includes much-needed changes to improve the outlook for striped bass, it also includes potential pitfalls, particularly on the topic of management triggers, that raise concern. In the paragraphs below, I have outlined my positions on each of the decision points for the four major issues contained in the draft amendment.

With over 30 years of involvement in the fishing in both Massachusetts and Rhode Island, I ask the Board to recognize the value and importance of this fish when it is alive and in abundance. The importance of this species cannot be overstated. States will see an explosion of positive impacts when a healthy, abundant and protected striped bass stock swims in our waters. The positive impact this fish can provide our communities when we allow them to be safely released is immense.

There are tens of thousands of anglers who share the same opinion as me. Striped Bass must be restored to abundance and we will no longer tolerate their failure. I ask the Board to not be misled by the few outspoken critics and misguided people who oppose Striped Bass conservation measures. Striped Bass are the most important fish in our waters and need to be treated and managed with the utmost respect.

Striped bass are at the core of the East Coast's recreational fishing community and economy, and all eyes are on the Striped Bass Board as you decide the fate of the ASMFC's flagship species. Please take this opportunity to position this treasured species for recovery and long-term success.

#### **4.1 Management Triggers**

##### **TIER 1 OPTIONS: Fishing Mortality (F) Triggers**

- **Option A:** Timeline to Reduce F to the Target

**I support Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year. I believe that wherever possible the board should move as quickly as possible to reduce fishing mortality. Sub-option A1 offers the shortest timeframe to get it back below the target.

- **Option B: F Threshold Triggers**

**I support Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

- **Option C: F Target Triggers**

**I support Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

### **TIER 2 OPTIONS: Female Spawning Stock Biomass (SSB) Management Triggers**

- **Option A: Deadline to Implement a Rebuilding Plan**

**I support Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment.

- **Option B: SSB Threshold Trigger**

**I support Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

- **Option C: SSB Target Trigger**

**I support Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

### **TIER 3 OPTIONS: Recruitment Triggers**

- **Option A: Recruitment Trigger Definition**

**I support Sub-option A3:** The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model (NY, NJ, MD, VA) shows an index value that is below the median of all values in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years. The high recruitment reference period used for this trigger may be adjusted as recommended by the TC during benchmark stock assessments. This trigger alternative has a higher sensitivity than both the status quo trigger and sub-option A2 (Figure 1). This trigger alternative would have tripped six times since 2003: NY in 2006; MD in 2008; MD in 2009; MD and VA in 2010; NY in 2013; MD in 2014 (Table 2). The status quo (current trigger) has only been

tripped once in the time period between 2003-2020, clearly it is not sensitive enough based on where the stock is currently at. A2 would have tripped the trigger 3 times in that same time period. A3, while classified as a “high sensitivity trigger”, would have tripped the trigger 6 times in that same time frame. As with the other options supported, I believe the board needs to operate with more caution moving forward, being aware of and addressing years of low recruitment ASAP.

- **Option B: Management Response to Recruitment Trigger**  
**I support Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year. In the past, the board has failed to adjust F to account for both good and bad year classes (recruitment). With several recent years of poor year classes I ask the board to be more responsive to these shifts. B2 puts an interim F target adjustment in place if the recruitment trigger is tripped.

#### **TIER 4 OPTIONS: Deferred Management Action**

- **I support Option A (status quo):** No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger. I cannot support any options which allow the board to defer action if a management trigger is tripped. Options B-F all allow for deferred action by the board in the event of a management trigger. Given where the stock is currently at, overfished with overfishing occurring, the “Board’s concern about the frequent need for management action due to triggers tripping with each stock assessment update or benchmark” is quite frankly, absurd. Stock assessments are typically conducted every 2 years (COVID delayed the last one) and benchmark assessments every 5 years. If the board needs to convene and take action more frequently to maintain a healthy stock then so be it.

#### **4.2 Recreational Fishery Management Measures**

- **Option B: Effort Controls (Seasonal Closures)**  
**I support Sub-option B2.** Spawning Area Closures: The Board can select either or both of the following sub-options B2-a and B2-b. Multiple states currently have spawning closures in place with closure boundaries defined by those states. Existing spawning closures would be applied toward meeting the requirements of the selected option(s).<sup>15</sup> Spawning area closures during the spawning season could contribute to stock rebuilding by eliminating harvest and/or reducing releases of spawning and pre-spawn fish. Reducing releases during this time is particularly important to reduce stress and injury to fish as they move into lower salinity spawning areas. If new information on the timing of striped bass spawning is available in the future, the TC would conduct a review of that research and recommend changes to the timing of spawning closures if needed. If this option is selected, CE would not be permitted.
- **I support Sub-option B2-b.** No-Targeting Spawning Closure Required: All recreational targeting of striped bass would be prohibited for a minimum two-week period on all spawning grounds (not necessarily the entire spawning area) during Wave 2 (March-

April) or Wave 3 (May-June), as determined by states to align with peak spawning. States will determine the boundaries of spawning ground closures. Closures prohibiting recreational targeting on spawning grounds have already been implemented in Maine (Kennebec River), New Jersey (Delaware River), and Maryland (Chesapeake Bay) during part of Wave 2 and/or Wave 3 (Figure 4).

This is an important one! And while this is a complex section of Amendment 7 I believe it is vital to the recovery of the SSB and stock as a whole. Sub-option b2-a would prohibit harvest but allow for catch and release, b2-b would be a no targeting closure and would provide the best protection for the SSB while they spawn. The option is somewhat open ended with the language calling for a “minimum two-week period,” I would like to see it closer to a four or six week period in order to see the best results and gain the most protection for the SSB. Many other species benefit from shortened seasons or spawning closures and Striped Bass should as well. Considering the stock is currently overfished with overfishing occurring, the least we can do is allow for uninterrupted spawning. The argument that Striped Bass would be a bycatch while fishing for Bluefish or other species is mostly null as Bluefish do not show up in great numbers until after this timeframe. The uncertainty regarding these options surround the definition of the spawning areas and the possibility that states may need to work together to provide the most amount of protection for the SSB as they stage ahead of the spawn and then move up into the river to do so. The best example of this is the case of the Hudson River where fish stage in Raritan Bay, New Jersey before ascending the Hudson River to spawn in NY. In a best case scenario this targeting closure would not only protect the spawning grounds but also the areas in which the SSB congregates prior to spawning, they go hand in hand. Despite these uncertainties I support these options with the hope that the TC and board will work together to develop these areas. Overall these options err on the side of caution but with the Striped Bass SSB and stock as a whole being in such a dire situation, I believe any gain, no matter how big is worth the risk involved.

- **Option C: Additional Gear Restrictions**

**I support Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**I support Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury. These options are a no brainer. Let’s prevent the use of gaffs for removing fish from the water in the event that they would need to be released as slot limits require more fish to be released. C2 would require non circle hooked fish (J-hook when fishing for other species) to be returned to the water as soon as possible and with careful handling. Both of these measures combat recreational release mortality which has been determined to have a large effect on F.

- **Option D: Outreach and Education**

**I support Sub-option D1:** States would be required to promote best striped bass handling and release practices by developing public education and outreach campaigns. States must provide updates on public education and outreach efforts in annual state compliance reports. States collect license fees and I believe some of that money should be spent on angler education and more specifically catch and release best practices. Option D2 only recommends that “states continue to promote best striped bass handling

and release practices by developing public education and outreach campaigns.” I believe that this should not just be a recommendation but a requirement. Angler education is an essential method to help curb recreational release mortality and ultimately help rebuild the stock to abundance.

#### **4.4 REBUILDING PLAN**

##### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

- **I support Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis. As I have mentioned, young of year over the past 3 years has been well below average. Combine this with the fact that Addendum 6 only addressed mortality and not rebuilding the stock and now we are in a terrible spot. The writing has been on the wall for years, if you were on the water it was clear that the stock was in trouble. Option B bases the rebuild of the SSB on the ‘low recruitment regime assumption,’ more in line with the poor year classes previously mentioned. It would likely achieve a lower level of removals and require more restrictive management measures.

##### **4.4.2 Rebuilding Plan Framework**

- **I support Option B:** 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 recruitment assumption specified in Amendment 7) 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. A new stock assessment will be published in October 2022 and depending on the outcome it may have a massive impact on the measures being put in place by Amendment 7. It is an unfortunate situation and likely could have been avoided if the board took action sooner but it is a concession we should be willing to make to prevent a further delay in developing and putting into action an addendum to Amendment 7. As noted it appears the board is willing to allow some sort of public involvement in the process. “Under this option, public comment could be provided during Board meetings per the Commission’s guidelines for public comment at Board meetings, and/or public comment could be provided in writing to the Board per the Commission’s timeline for submission of written public comments prior to Board meetings.”

#### **4.6 ALTERNATIVE STATE MANAGEMENT REGIMES**

##### **4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option B. Restrict the Use of Conservation Equivalency Based on Stock Status**

- **I support Sub-option B1:** Restrictions: CE programs would not be approved when Sub-option B1-a: the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level. While I was hoping to see conservation equivalency completely removed from the management process, that is not an option within Amendment 7. The TC has stated that the implementation of CE in the

management process is unquantifiable and will likely cloud the regulations put in place by states to reach the overall reductions necessary. Option B, sub-option B1 provides the most limitations to the use of CE by states, some of whom have taken advantage of it. The stock needs to be managed for abundance and therefore I'd like to let the Commission know that CE has no place in a stock that is overfished with overfishing occurring. If you only choose to speak on or select a few options from A7, this should certainly be one of them.

#### **4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

- **I support Sub-option C3:** CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30. This is the most conservative option available as stated in Amendment 7 “NMFS warns that “[MRIP] Estimates should be viewed with increasing caution as PSEs increase beyond 30. Large PSEs—those above 50—indicate high variability around the estimate and therefore low precision.”. I want to make sure the CE is only accessible if tightest estimate and least amount of risk.

#### **4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

- **I supports Sub-option D3:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 50%. An uncertainty buffer refers to the previously mentioned unquantifiable results of states putting CE in place as pointed out by the TC. What this means in simple terms is, if a state wants to make use of CE they will need to plan for a buffer to account for possible overages of F. In other words it could be thought of as a tax for using CE. This will hopefully discourage states from using CE in the first place. I would like to see the biggest buffer possible (50%) put in place to dissuade states from trying to use CE. If they do opt to use it the 50% buffer would hopefully counteract the potential overages in F.

#### **4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

- **I support Sub-option E2:** Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state-specific level. This would essentially undo the terribly unfortunate series of events that transpired during the addendum 6 process. New Jersey felt that the coastwide 18.5% reduction based on harvest was unfair as it translated to a larger reduction for them due to the complication of the slot limit. The board sided with New Jersey who then ultimately failed to meet its goals and in the end took no reduction. Therefore, I must select option E2.

Sincerely,  
Ben Scott



**From:** [SAF JR](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Conservation  
**Date:** Monday, April 11, 2022 9:00:20 PM

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Hello,

I incorrectly stated that a slot was needed but then realized there is already a slot.

The slot does not help with commercial fishing.

My most important recommendation is to halt commercial fishing.

We do not need to eat species that are threatened.

Time to focus on consuming less desirable species that are more numerous. Yes, it could affect the livelihood of fishermen but so would having the Striped Bass go extinct!

Time to wake up and make the hard decision to STOP commercial fishing of Striped Bass. If you're not going to recommend stopping commercial fishing then make the regulations so tight that it is not profitable to do so.

Thanks in advance.

Sent from my iPhone

**From:** [Michael Parrack](#)  
**To:** [Comments](#); [Emilie Franke](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Monday, April 11, 2022 8:57:43 PM

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April 11<sup>th</sup>, 2022

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

Dear Emilie Franke,

I am a long island resident who has spent the last several years enjoying recreational fishing for striped bass, both by boat as well as from the shore. Over recent years, I've experienced a decline in the number of striped bass landed. I feel the striped bass population has declined due to over fishing and would support actions needed to help bring the population back to an abundant state as it was a decade ago.

The following conservative options in Amendment 7 are what I hope to see adopted:

*TIER 1 OPTIONS: Fishing Mortality (F) Management Triggers*

Option A: Timeline to Reduce F to the Target

**Sub-option A1**

Option B: F Threshold Triggers

**Sub-option B1**

Option C: F Target Triggers

**Sub-option C1**

TIER 2 OPTIONS: Female Spawning Stock Biomass (SSB) Management Triggers

Option A: Deadline to Implement a Rebuilding Plan

**Sub-option A2**

Option B: SSB Threshold Trigger

**Sub-option B1**

Option C: SSB Target Trigger

**Sub-option C1**

*TIER 3 OPTIONS: Recruitment Triggers*

Option A: Recruitment Trigger Definition

**Sub-option A2**

Option B: Management Response to Recruitment Trigger

**Sub-option B2**

*TIER 4 OPTIONS: Deferred Management Action*

**Option A**

RECREATIONAL FISHERY MANAGEMENT MEASURES

Measures to Address Recreational Release Mortality

*Option B. Effort Controls (Seasonal Closures)*

**Sub-option B2-a**

*Option C. Additional Gear Restrictions*

**Sub-option C1 and C2**

*Option D. Outreach and Education*

**Sub-option D1**

REBUILDING PLAN

Recruitment Assumption for Rebuilding Calculation

**Option B**

Rebuilding Plan Framework

**Option B**

Management Program Equivalency

Option B. Restrict the Use of Conservation Equivalency Based on Stock Status

**Sub-option B1-a**

Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals

**Sub-option C3**

Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries

**Sub-option D2**

Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries

**Sub-option E2**

Thank you for taking my comments into consideration.

Best Regards,

Michael Parrack

3 Wall Street

Farmingdale, NY 11735

**From:** [Jeff Horowitz](#)  
**To:** [Comments](#); [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [Dan Mckiernan](#); [Raymond Kane](#); [Sarah.Peake@mahouse.gov](mailto:Sarah.Peake@mahouse.gov); [Michael Armstrong](#)  
**Subject:** [External] Striped Bass  
**Date:** Monday, April 11, 2022 8:44:15 PM

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Hello there,

I started fishing in Massachusetts in Buzzards Bay for striped bass, blues, etc for the last 10 years or so after 50+ years of boating without fishing. I have come to love and appreciate the wonderful fishery we have in SE Massachusetts and want it to last for my children and their children. There has been an obvious decline in the fish around over the last few years and I understand Amendment 7 addresses this and other issues as well. Please listen to our suggestions to let ASFMC manage Striped Bass to ABUNDANCE. It is so important to us. Please help ensure the health of our fishery.

Thanks so much. Jeffrey Horowitz MD

**From:** [Wayne Flanagan](#)  
**To:** [Comments](#)  
**Subject:** [External] Striper management  
**Date:** Monday, April 11, 2022 8:11:09 PM

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I've been fishing striper for 35 years recreationally. I have seen the ups and downs and this is the worst I can recall for big bass. Everyone is in agreement that something needs to be done soon and it has to be drastic. We have already done the circle hooks, the slot limits, etc etc. Its not working! I am 50 years old and not many casting years left. I am willing to stop fishing for 2-3 years if that's what it takes to get it back to the glory years. And that is saying something as I live for striper fishing. Let's just get it over with fast instead of a slow and steady return. I know the commercial guys don't want to give up the money so just let them have it if that's what it takes, and stop all recreational harvest. Any true rec fisherman would be willing to do it, although not fair, for a few years if that's what it takes to get back to the glory years of big bass. Honestly I'm in awe when I hear the commercial guys need more time to catch the quota and you extend it for them. Why?? It's obvious, if they aren't getting the quota in time, that the fishery is hurting and you give them more time to keep pounding it? I promise the person/people in charge are not fisherman. Not true fisherman.

Thanks,  
Wayne Flanagan  
Owner, New England Exteriors  
508-966-2400  
[www.newenglandext.com](http://www.newenglandext.com)

**From:** [Michael Sullivan](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Monday, April 11, 2022 8:10:45 PM

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To whom it may concern, I don't believe Draft Amendment 7 goes far enough to protect Striped Bass.

The following should be included in place of the current draft:

1. No harvesting of Striped Bass for the next 3 years for all states in the Mid Atlantic and Northeast Regions.
2. Make Striped Bass a gamefish by 2030
3. Increase illegal harvest of Striped Bass to \$10,000 per illegally harvested fish.

Thanks,  
Mike Sullivan

Sent from my iPad

**From:** [JDMillerFish](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Monday, April 11, 2022 8:10:12 PM

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I wish to provide the following comments on the Atlantic States Marine Fisheries Commission's (ASMFC) Draft Amendment 7. Striped bass are one of the most important fish species along the Atlantic coast, supporting robust recreational and commercial fisheries. The importance of striped bass is reflected in its status as Maryland and Virginia's state fish, a designation that represents its importance to the states' economies and culture. As such, the current striped bass population decline is of serious concern to me and ensuring their population is restored quickly should be the primary objective of the ASMFC throughout the Amendment 7 process. Below are specific comments on the most important issues presented in the draft amendment.

### Management Triggers

Management triggers, although extremely complex, are a critical part of the fishery management plan that set the conditions under which fishery managers need to take action in order to improve the health of populations. Unfortunately, history has shown this did not happen. Moving forward, ASMFC must adhere to the use triggers that help the Board effectively manage the species.

In general, I support the continued use (status quo) of the current fishing mortality triggers contained in Tier I. This includes the following specific options:

- Option A: Sub-option A1 which would keep the one-year timeline for reducing mortality below the target.
- Option B: Sub-option B1 which would use the timeline adopted in Option A for reducing mortality below the threshold.
- Option C: Sub-option C1 which would keep the current Target Trigger for mortality and spawning stock biomass using the timeline adopted in Option A.

For the Tier 2 Female Spawning Stock Biomass (SSB) Management Triggers, I support the following specific options:

- Option A: Sub-option A2 which would require the implementation of a rebuilding plan.
- Option B: Sub-option B1 which would seek to rebuild the striped bass populations in 10 years.
- Option C: Sub-option C1 which would keep the current SSB trigger than requires rebuilding the population within 10 years.

For the Tier 3 Recruitment Triggers I support Option A: Sub Option A3.

For the Tier 4 Deferred Management Options, I strongly support Option A: No Deferred Management Action.

### Recreational Fishery Management Measures

I support Option B along with the following sub-options:

- Option B2-a which would prohibit the recreational harvest of striped bass from January through April in the Chesapeake Bay spawning areas.

- Sub-option D1 which would require states to promote practices that reduce mortality of striped bass in the recreational fishery.

#### Rebuilding Plan Framework

I support Option B which would provide the Board the ability to quickly respond to the results of the 2022 stock assessment if additional conservation actions are warranted.

#### Conservation Equivalency

Now is the time to reconsider the widespread use of conservation equivalency in the management of the striped bass fishery. Unfortunately, poorly planned conservation equivalency proposals have all too often resulted in less than intended conservation benefit, with few consequences for the managers who have developed them. This has unfortunately, left the biological condition of the stock in worse shape than it should have been. Particularly when the striped bass stock is in poor condition, the use of conservation equivalency should be restricted in order to focus on the rebuilding of the coastwide population.

In order to begin the process to revise the conservation equivalency program I support Option B: Restrict the Use of Conservation Equivalency Based on Stock Status and Sub-option B1-a which would limit the use of conservation equivalency while the population is at or below the threshold.

Thank you for consideration of these comments and for allowing me to participate in the public comment period for Draft Amendment 7.



**From:** [George McAuliffe](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Monday, April 11, 2022 7:54:17 PM

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Dear Commissioners, Committee Members, Legislators, and others,

I fish, foot, car, and boats, principally out of New York City and Montauk, Long Island. I regularly visit the waters of NJ, NY, CT, RI, MA, and sometimes even ME and NH. I spend money in all of your states -- hotels, meals, gas, tackle stores, mechanics, retailers, and others. Much more than the few commercial fishermen that are killing our fishery. And without striped bass, I, and many many colleagues, would not be spending this money in your states.

Plus, environmentally, better protecting striped bass is simply the right thing to do.

Accordingly, I fully support ASGA's positions (below for reference) on the upcoming fishery management plan -- and especially on 4.6.2 Management Program Equivalency, better known as Conservation Equivalency (CE) -- and I ask you to vote or legislate accordingly in your roles as stewards of our natural resources.

Thank you,  
George McAuliffe

**Below are the formal positions of the American Saltwater Guides Association on each of the four options in the draft amendment:**

#### **4.1 Management Triggers**

Tier 1: Fishing Mortality (F) Triggers

##### **Option A: Timeline to Reduce F to the Target**

**ASGA Supports Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year.

##### **Option B: F Threshold Triggers**

**ASGA Supports Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

##### **Option C: F Target Triggers**

**ASGA Supports Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

Tier 2: Spawning Stock Biomass (SSB) Triggers

### **Option A: Deadline to Implement a Rebuilding Plan**

**ASGA Supports Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

### **Option B: SSB Threshold Trigger**

**ASGA Supports Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

### **Option C: SSB Target Trigger**

**ASGA Supports Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

Tier 3: Recruitment Triggers

### **Option A: Recruitment Trigger Definition**

**ASGA Supports Sub-option A2:** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

### **Option B: Management Response to Recruitment Trigger**

**ASGA Supports Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

Tier 4: Deferred Management Action

### **ASGA Supports Option A (status quo): No Deferred Management Action.**

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

## **4.2.2 Measures to Address Recreational Release Mortality**

### **Option C. Additional Gear Restrictions**

**ASGA Supports Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**ASGA Supports Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

#### **Option D. Outreach and Education**

**ASGA Supports Sub-option D2:** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

### **4.4 Rebuilding Plan**

#### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

**ASGA Supports Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

#### **4.4.2 Rebuilding Plan Framework**

**ASGA Supports Option B:** 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 recruitment assumption specified in Amendment 7) 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.

#### **4.6.2 Management Program Equivalency (Conservation Equivalency)**

##### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

**ASGA Supports Sub-option B1-a:** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

##### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

**ASGA Supports Sub-option C3:** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent

standard error (PSE) exceeding 30%.

**Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

**ASGA Supports Sub-option D2:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

**Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

**ASGA Supports Sub-option E2:** the percent reduction/liberalization projected for the FMP standard at the state-specific level.

There it is!

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Virus-free. [www.avg.com](http://www.avg.com)

**From:** [Joseph Mogavero](#)  
**To:** [Comments](#); [Emilie Franke](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Monday, April 11, 2022 7:25:46 PM

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April 11<sup>th</sup>, 2022

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

Dear Emilie Franke,

I'm a 44-year-old recreational fisherman who has spent his entire adult life fishing from the Long Island shores and surrounding waters. Over the last decade or more, I've experienced a significant decline in the number of striped bass landed every season. As I'm sure you are well aware, the 2018 benchmark stock assessment indicated the striped bass stock has been overfished since 2013 and is experiencing overfishing. It's time we end the overfishing and allow the striped bass population to return to the abundance I remember in the early 2000s.

The following options in Amendment 7 are what I would like to see adopted by the Atlantic Striped Bass Management Board.

*TIER 1 OPTIONS: Fishing Mortality (F) Management Triggers*

Option A: Timeline to Reduce F to the Target

**Sub-option A1**

Option B: F Threshold Triggers

**Sub-option B1**

Option C: F Target Triggers

**Sub-option C1**

*TIER 2 OPTIONS: Female Spawning Stock Biomass (SSB) Management Triggers*

Option A: Deadline to Implement a Rebuilding Plan

**Sub-option A2**

Option B: SSB Threshold Trigger

**Sub-option B1**

Option C: SSB Target Trigger

**Sub-option C1**

*TIER 3 OPTIONS: Recruitment Triggers*

Option A: Recruitment Trigger Definition

**Sub-option A2**

Option B: Management Response to Recruitment Trigger

**Sub-option B2**

*TIER 4 OPTIONS: Deferred Management Action*

**Option A**

RECREATIONAL FISHERY MANAGEMENT MEASURES

Measures to Address Recreational Release Mortality

*Option B. Effort Controls (Seasonal Closures)*

**Sub-option B2-a**

*Option C. Additional Gear Restrictions*

**Sub-option C1 and C2**

*Option D. Outreach and Education*

**Sub-option D2**

REBUILDING PLAN

Recruitment Assumption for Rebuilding Calculation

**Option B**

Rebuilding Plan Framework

**Option B**

Management Program Equivalency

Option B. Restrict the Use of Conservation Equivalency Based on Stock Status

**Sub-option B1-a**

Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals

**Sub-option C3**

Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries

**Sub-option D2**

Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries

**Sub-option E2**

Thank you for taking my comments into consideration.

Best Regards,  
Joseph Mogavero  
16 Neil Drive  
Smithtown, NY

**From:** [jeff@outcastlures.com](mailto:jeff@outcastlures.com)  
**To:** [Comments](#)  
**Cc:** [Michael Armstrong](#); [Dan Mckiernan](#); [Rep. Sarah K. Peake](#); [Raymond Kane](#); [LOWELL WHITNEY](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Monday, April 11, 2022 4:28:48 PM

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As an individual with a passion for recreational fishing, as well as an industry professional, I would like to present my input for Draft Amendment 7 consideration. I have presented my input as a clear “wants list” with little commentary, so as to reduce your workload while lending my voice. I ask that you all take these to reflect my position.

## **Management Triggers**

### **Tier 1 Options – Fishing Mortality (F) Triggers**

- **Sub-Option A1**
- **Sub-Option B1**
- **Sub-Option C1**

Because fishing mortality (F) is a direct result of angler effort and behavior, and subsequently can be controlled by management action more readily than any other trigger, rapid response should be a top priority for F triggers.

### **Tier 2 Options – Female Spawning Stock Biomass (SSB) Management Triggers**

- **Sub-Option A2**
- **Sub-Option B1**
- **Sub-Option C2**

Female Spawning Stock Biomass (SSB) is the gauge by which the fishery’s abundance is measured, and as a result any decrease in abundance should be addressed appropriately by the Board.

### **Tier 3 Options – Recruitment Triggers**

#### **Priorities for Inclusion:**

- **Sub-Option A2**
- **Sub-Option B2**

Juvenile recruitment relies on factors other than female SSB and fishing mortality and thus, even a well-managed fishery can suffer from low recruitment during periods when several years of sub-optimal conditions occur in a row.

### **Tier 4 Options – Deferred Management Action**

#### **Priorities for Inclusion:**

- **Option A**

We do not support any of the deferred management options that would allow response to triggers to be ignored or delayed.

## **Measures to Address Recreational Release Mortality**

### **Priorities for Inclusion:**

- **Sub-Option C1**
- **Sub-Option C2**
- **Sub-Option D2**

We prioritize recovering the stock as quickly as reasonably possible as a guiding principle, and while the intent of Option B and its sub-options appears to be decreasing fishing mortality by reducing recreational effort, we oppose the proposed measures for inclusion in Amendment 7.

## **Rebuilding Plan**

### **Recruitment Assumption for Rebuilding Calculation**

#### **Priorities for Inclusion:**

- **Option B**

A formal rebuilding plan to recover the stock by 2029 remains nonexistent. Further, we continue to be concerned about the declining trend of the stocks. We emphasize that the Board take measures to protect the fish that remain in the water by including option B.

### **Rebuilding Plan Framework**

#### **Priorities for Inclusion:**

- **Option B**

We are concerned that the 2022 stock assessment could indicate measures included in Amendment 7 are unlikely to achieve recovery by 2029. Thus, the benefit of option B is that such action could be taken almost immediately, rather than requiring a year-long addendum process. Recognizing that this option would be a one-time allowance and is contingent on a very dire outlook for the future of the fishery we support Option B, which would allow the Board to implement needed recovery measures as quickly as possible should the measures included in Amendment 7 be unlikely to achieve recovery by 2029.

## **Management Program Equivalency**

### **Priorities for Inclusion:**

- **Sub-option B1-a**
- **Sub-option C3**
- **Sub-option D2**
- **Sub-option E2**



To paraphrase ASMFC's Guidelines, the concept of Conservation Equivalency (CE) is intended to allow states flexibility to develop alternative regulations that better accommodate local conditions while still achieving the overall conservation goals of the Fishery Management Plan.

Jeff Adams

[jeff@outcastlures.com](mailto:jeff@outcastlures.com)

[www.outcastlures.com](http://www.outcastlures.com)

@outcast\_lures

#OutCastLures

#OutCastThemAll



**From:** [Dicostanzo, Don \(N-Asplundh Tree\)](#)  
**To:** [Comments](#)  
**Subject:** [External] striped bass PID  
**Date:** Monday, April 11, 2022 4:15:18 PM

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Dear Ms. Franke,

The reason for this letter is to provide my comments regarding draft amendment 7 in to the Interstate Fishery management plan concerning Striped Bass .below are the options that I would prefer

and hopefully the board will also. I have been a recreational fisherman all my life and throughout the years

have been witness to many changes in the fishery (mostly not good).

Over fishing ,poaching ,and a blatant disregard for any laws .

How many of these Triggers have to be pulled before a shot is fired.

I would like the board to remember its about the Fish not the fishermen and woman.

Tier 1

Sub option A1

Sub option B1

Sub option C1

Faster action is needed

Tier 2

Sub option A2

@year rebuilding plan

Sub option B1

Sub option C1

Tier 3

Sub option A2

Sub option B2

Tier 4

Option B2-a

Zero harvest of bass in spawning areas January-April.

Sub sec. C1

No gaffs allowed I see no reason for them in any way bass don't have teeth !

Rebuilding plan

Option B

Quicker stock easement

Management program equivalency

Option B1-a  
Option C.  
Option D2

Thank you

Donald Dicostanzo  
19 peony lane Commack ny  
11725

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**From:** [Stephen Barone](#)  
**To:** [Comments](#); [Dan Mckiernan](#); [Michael Armstrong](#); [Rep. Sarah K. Peake](#); [Raymond Kane](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Monday, April 11, 2022 3:59:02 PM

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To whom it may concern,

I've been fishing for Striped Bass for approximately 30 of my 34 years. Fishing, specifically striped bass fishing, is quite literally part of the glue that holds my family together. My fondest memories are of time spent fishing for stripers from Cape Ann to Cape Cod and beyond with my father and brother.

It's no secret that striped bass fishing is nothing like it was when I was growing up in the mid 90s, and my personal log of over 60+ trips a year show that it has been declining for quite some time now. As a father of two young boys now I hope that the appropriate action is taken to save the fish we love so much so that they have the same opportunity that I did.

As such, I support the following in hopes of saving this fishery:

- Tier 1
  - Sub Option A1
  - Sub Option B1
  - Sub Options C1
- Tier 2
  - Sub Option A2
  - Sub Option B1
  - Sub Options C1
- Tier 3
  - Sub Option A1
  - Sub Option B2
- Tier 4
  - Option A

Thank you for your time.

--

Stephen Barone  
617-460-5611  
[stephenbarone2@gmail.com](mailto:stephenbarone2@gmail.com)

**From:** [Roger Sherman](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Monday, April 11, 2022 2:44:33 PM

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I would like to comment on the Striped Bass Management plan.  
Simply put, striped bass are declining and MUCH more needs to be done to protect them.

Big fish should not be allowed to be taken. They're the ones who've survived and will continue to proliferate the species.  
It's the smaller fish which can be taken.

I am not a captain, just a fisherman who cares a great deal about protecting our fishery. As a documentary filmmaker and photographer, who's made award winning environmental films, one of my environmental films was nominated for an Academy Award, I have decades of environmental experience.

Please do everything possible to limit taking stripers and help this amazing species thrive.

Thank you.  
Roger Sherman  
New York City

**He/Him/His**



[Roger.Sherman@FlorentineFilms.com](mailto:Roger.Sherman@FlorentineFilms.com) — [www.FlorentineFilms.com/Sherman](http://www.FlorentineFilms.com/Sherman)  
Florentine Films/Sherman Pictures, 136 East 56th St., suite 4B, New York, NY 10022, 212.980.5966



**From:** [JAMES MORABITO](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 Comments  
**Date:** Monday, April 11, 2022 2:23:25 PM

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To the commission:

I am commenting on the proposed striped bass Amendment 7.

My name is James Morabito and I am from the state of Massachusetts. I am an avid Surfcaster who cares deeply for our striped bass fishery.

Briefly, here are my choices:

4.1

Tier 1

Option A- Support A1

Option B- Support B1

Option C- Support C1

Tier 2

Option A- Support A2

Option B- Support B1

Option C- Support C1

Tier 3

Option A- Support A3

Option B- Support B2

Tier 4

Support A

4.2

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D1

4.4.1

Support B

4.4.2

Support B

4.6.2

Option B- Support B1-a

Option C- Support C3

Option D- Support D2

Option E- Support E2

I also have several other comments I would like to make:

This is a critical moment for the striped bass, and we all including the commission know it. Please, consider managing the striped bass for abundance and not for yield when making your decisions. Note that the striped bass fishery is almost entirely a recreational, catch and release, fishery, and that is where the largest portion of the GDP generated by the fishery comes from. The good news is that it is not too late. Please, act fast and follow science and the majority's wishes: do not delay or we will lose this fishery forever.

We need better management and more aggressive measures that have a higher likelihood of protecting the fishery and rebuilding and responding more quickly. I am in support of management that favors keeping "too many" fish and responding to low spawning years and increasing effort on a year-by-year basis.

I am in total opposition to any measure that would decrease the benchmarks the fishery is managed. That is, we should not be lowering or shifting baselines. We have managed the population well in the past and should never consider decreasing our population targets (SSB thresholds and triggers). A sliding baseline is unacceptable

and will cause the demise of this fishery!

I ask that the ASMFC act quickly, decisively, and with abundance- not yield- at the forefront of their striped bass management decisions. We must rebuild this fishery in less than 10 years, and at all costs, and that requires immediate and aggressive action from the commission.

Thank you for the opportunity to comment, and I hope that my voice will be heard and that we can save this fishery.

Sincerely,

James Morabito  
Newbury, Massachusetts



From: [Steve Culton](#)  
To: [Comments](#)  
Cc: [WILLIAM HYATT](#); [Sen. Craig A. Miner](#); [Justin Davis](#); [ROBERT LAFRANCE](#); [Rep. Melissa Ziobron](#)  
Subject: [External] Amendment 7  
Date: Monday, April 11, 2022 2:13:59 PM

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To the ASMFC:

Here are my comments on the proposed Amendment 7. As you know, it's a lot to get through. My choices are as follows:

4.1

Tier 1

A1

B1

C1

Tier 2

A2

B1

C1

Tier 3

A2

B2

Tier 4

A

4.2

B- None

C1, C2

D2

4.4.1

B

4.4.2

B

4.6.2

B1-a

C3

D2

E2

It is my strongest belief that we need to act quickly and decisively to preserve our precious striped bass stocks. I am catching far fewer striped bass than I did 15-20 years ago, and far fewer larger striped bass. Please save our stripers!

Thank you for your consideration,

Steve Culton  
Connecticut

**From:** [Brent Flack-Davison](#)  
**To:** [Comments; stripercomments@gmail.com](#)  
**Subject:** [External] Amendment 7 - striped bass  
**Date:** Monday, April 11, 2022 1:57:39 PM

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To whom it may concern:

Striped bass is an incredibly important resource for recreational fishermen and the population is in serious decline! We need to act NOW in order to save the population, again! We caused it to collapse once, let's not let it happen again! I want to be able to catch striped bass with my sons too!

Please act before it is too late.

Here are my positions on the amendments.

Thank you  
Brent Flack-Davison

#### 4.1 Management Triggers

Tier 1: Fishing Mortality (F) Triggers

##### **Option A: Timeline to Reduce F to the Target**

**BRENT Supports Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year.

##### **Option B: F Threshold Triggers**

**BRENT Supports Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

##### **Option C: F Target Triggers**

**BRENT Supports Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

Tier 2: Spawning Stock Biomass (SSB) Triggers

##### **Option A: Deadline to Implement a Rebuilding Plan**

**BRENT Supports Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

##### **Option B: SSB Threshold Trigger**

**BRENT Supports Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

### **Option C: SSB Target Trigger**

**BRENT Supports Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

Tier 3: Recruitment Triggers

### **Option A: Recruitment Trigger Definition**

**BRENT Supports Sub-option A2:** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

### **Option B: Management Response to Recruitment Trigger**

**BRENT Supports Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

Tier 4: Deferred Management Action

### **BRENT Supports Option A (status quo): No Deferred Management Action.**

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

## **4.2.2 Measures to Address Recreational Release Mortality**

### **Option C. Additional Gear Restrictions**

**BRENT Supports Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**BRENT Supports Sub-option C2:** Striped bass caught on any unapproved method

of take would be returned to the water immediately without unnecessary injury.

## **Option D. Outreach and Education**

**BRENT Supports Sub-option D2:** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

## **4.4 Rebuilding Plan**

### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

**BRENT Supports Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

### **4.4.2 Rebuilding Plan Framework**

**BRENT Supports Option B:** 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 recruitment assumption specified in Amendment 7) 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.

### **4.6.2 Management Program Equivalency (Conservation Equivalency)**

#### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

**BRENT Supports Sub-option B1-a:** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

#### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

**BRENT Supports Sub-option C3:** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

#### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

**BRENT Supports Sub-option D2:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

## Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries

**BRENT Supports Sub-option E2:** the percent reduction/liberalization projected for the FMP standard at the state-specific level.

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Brent Flack-Davison

(c) +1 202 550 3464

(e) [brentfd@gmail.com](mailto:brentfd@gmail.com)

**From:** [John Potter](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment 7  
**Date:** Monday, April 11, 2022 1:52:57 PM

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To whom it may concern. I am very worried about the Striped Bass on the east coast. I live on the Ri/Ct border, am retired and have fished every day for the last 12 yrs, weather permitting. I only fly fish with barbless hooks and for the last 5 yrs my boat has been a “no kill zone”.

Five years ago I noticed the population decreasing. The 2020 season was fair to mediocre. A very interesting observation last year was that I caught more fish over slot and way fewer slot size bass. The under slot fish were the predominant year class.

My fondest dream would be to have both a commercial and recreational moratorium and to make Striped Bass a game fish. We should also ban all bass fishing above the I-95 bridge from February to June. Montana closes all fishing in spawning tributaries from October thru June to protect spawning trout. I am also appalled that Ct. allows fish to be sold in fish stores that would not be legal to keep in Ct. waters.

All that being said I strongly support The ASWG stance on the amendments. They take a more reasoned approach than I do and I think probably more in line with the general public.

Thank you for reading my Rant,

John Potter  
Groton, Ct.

Sent from my iPad

**From:** [Mark](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Monday, April 11, 2022 1:25:38 PM

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This comment is to support Amendment 7 and specifically Conservation Equivalency. Striped Bass are the defining saltwater fish of the eastern coast. We need to protect them as best we can. Another collapse of the fishery is unacceptable. When I was growing up in CT, we could hardly even catch one. Luckily I was around to see the population come back. We can do it again. Please vote to pass Amendment 7. Thanks you.

Mark Cooper

Sent from my iPhone



**From:** [mike marzo](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Monday, April 11, 2022 1:24:45 PM

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I'm for the Striped bass fishery being a catch and release fishery only.

Mike Marzo  
Nj

**From:** [Matthew Fry](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Monday, April 11, 2022 1:24:29 PM

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To Whom it May Concern – I have been an avid fisherman since is was a little kid (now 52). I regularly fish from April 15th in NJ & Jamaica Bay Area and follow the bass up the coast thru Long Island Sound (I live in Rowayton CT) to Rhode Island, Nantucket, Block Island and Montauk all summer and back down to NJ to close off the fall run in Nov. I have been around for a while and I’m greatly concerned about the health of the striped bass population. I was around when a particular birth year was protected which seemed to make a difference but it only last for a short time before the bass were thin again. We have lost many mid-size fish (8-18lbs)...I barely catch them anymore. Regardless, I am hoping the folks who love this species have an opportunity for our voices to be heard. Fishing with my sons and daughter is one of our favorite things to do...I want to be able to continue that and have them have the same opportunity with their children.

Thanks for listening  
Matt Fry

**From:** [Jamie Clough](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass PID  
**Date:** Monday, April 11, 2022 1:21:29 PM

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Good afternoon..having fished the bay for over 45 years its heart breaking to see what is happening to striped bass..

I have a few areas that concern me..

1) From my states perspective(Maryland)

They seem to be demonizing catch and release..I am a light tackle guide who is probably close to 80% catch and release..

Limiting the days we can fish seriously hurts my guide business..

Education of proper catch and release is one of the most important things I teach on my charters..

One of the main differences in catch and release here is I use artificial baits..minimal harm to the fish..

Bait and live lining by far do the most damage to stripers for catch and

I dont do either..

I would love to see a 1 person limit on striped bass for all..including charters..

If we all have to give something to progress the population then I am all for it..

I really have a serious problem with having a closure (April and 2 wks in July) and still harvesting too many fish..

There are other species to target in other waters which are 2-3 hours from my home port..

I also take in consideration the fantastic comeback of the Red drum

They protect the breeders...simple math dont kill the breeders...they will come back

Thank You

Capt Jamie Clough

Eastern Shore Light Tackle Charters

4437865266

**From:** [Thomas Buell](#)  
**To:** [Comments](#)  
**Cc:** [Thomas Buell](#)  
**Subject:** [External] Ammendment 7  
**Date:** Monday, April 11, 2022 1:21:12 PM

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To Whom it may concern.

My name is Thomas P Buell, I'm a resident of Rockaway Beach Queens NY 11694 and I'm 64 years old and have been fishing the saltwater for 56 years.

I have fished for many species but my focus has been striped bass for the past 45 years. NY, NJ and Mass.

It is painfully obvious that Striped bass populations are in a sad state, when I was younger we had resident populations of bass and when mullet moved in September you had amazing surf fishing and the same when baby bunker started showing in the surf begging in October.

The Cape and Montauk were teeming with bass and fishing was good during summer months there also. But then the crash came followed by the moratorium and the moratorium worked it was great! In NY when the moratorium was lifted we were allowed 1 fish at 36 inches the logic at the time was this allowed females to spawn at least twice thus contributing to the Bio-mass before being harvested, the fish were back. But managers failed when they allowed party and charter boats to keep 2 fish and the ordinary fisherman only one as well as lowering size limits so now smaller females that mightn't be sexually mature also get harvested. Also here in NY the striper season used to start on May 15<sup>th</sup> and then that was changed to April 15<sup>th</sup> this is a travesty harvesting fish before they head up river to spawn and in NJ open season begins March 1<sup>st</sup> this is outrageous! NJ fisherman kill everything there bag limits and seasons are disturbing, Striper regulations should be uniform throughout the entire striper coast. Game fish status is the way to go because as it stands right now there's way to much poaching going on Everywhere!

There seems to be a few populations that move up and down the coast as opposed to a huge distribution of fish and if that pod isn't in your area you're not catching, so when they are found every bass fisherman in the world converges into these areas.

So let's do it right, and whoever decided that maximum sustainable yield was the way to go really? Maximum and sustainable equals oil and vinegar. Science first.

Thomas P Buell  
550 Beach 130<sup>th</sup> street  
Belle Harbor Queens NY 11694.

[buelldust@aol.com](mailto:buelldust@aol.com)

**From:** [Joe Nicosia](#)  
**To:** [Comments](#)  
**Subject:** [External] DRAFT AMENDMENT 7  
**Date:** Monday, April 11, 2022 1:21:01 PM

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I am a recreation flyfisherman in saltwaters for 25 years . I always catch and release!

--

Joseph Nicosia  
Implementation Engineer,  
Solutions Consulting & Support Division  
Canon Solutions America  
[Jnicosia@solutions.canon.com](mailto:Jnicosia@solutions.canon.com)

Cell- 609-346-2969

**From:** [Carl & Alicia](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped bass situation  
**Date:** Monday, April 11, 2022 12:08:09 PM

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New York State once again has the striper regulations about as screwed up as they could be. Could someone explain to me why a person catching stripers in Raritan Bay, which are heading into the Hudson to spawn, are allowed to keep a fish up to 35 inches but someone fishing in the Hudson can only keep them to 28. They are the same fish.

From all I have read the striped bass population problem seems to be recruitment, if this is the case, why aren't the East coast states all stocking millions of these fish? Stocking is a proven method to boost problem fish populations, musky, trout, salmon, striped bass in freshwater reservoirs. Stock these valuable game fish and maybe there would be enough for everyone to enjoy a meal of striped bass if they so choose.

As far as funding these stockings, if NYS sold a trophy striper tag, one per person per year, they could go a long way to fund this stocking effort. It just seem like no one wants to think of any solution other than sticking it to the recreational angler because it doesn't cost the State any thing to stick it to the fishermen.

We make an annual trip to fish stripers on the Hudson every spring. It is fun catching these great fish but we also like eating them. If NYS closes the season for keeping stripers on the Hudson, we will not make that trip, along with many others, which will have an economic impact on the towns up and down the river. You need to come up with better solutions than the ones that aren't working now.

Sent from my iPad

**From:** [Surdel, Dave](#)  
**To:** [Comments](#)  
**Cc:** [Michael Armstrong](#); ["stripercomments@gmail.com"](mailto:stripercomments@gmail.com); [Dan Mckiernan](#); [Rep. Sarah K. Peake](#); [Raymond Kane](#); [LOWELL WHITNEY](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Monday, April 11, 2022 11:57:16 AM

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To the members of the Striped Bass Board,

I would like to comment on Draft Amendment 7. I am a recreational fisherman based in Massachusetts, however I travel all over new England in pursuit of striped bass. I have been an avid fisherman for over 20 years and would like to briefly share my observations. I have seen a precipitous decline in the bass population, particularly over the past 8-10 years. Where we once had reliable large schools of adult bass, there are now only juvenile fish or no fish at all. This is not isolated to one location. The trend is evident in Cape Cod Bay, Buzzards Bay, the backside of the cape and Monomoy and the Islands. The same can be said for South County, RI and Montauk. The legendary fall run fishing that we once enjoyed in New England/New York has practically disappeared. Charters, small businesses and tackle shops continue to close their doors. Fishing pressure has reached an all-time high thanks to Covid and social media. Respectfully, the board has not responded quickly enough to stem the decline. The bass population is crashing and The Board needs to take swift action and significant steps to reverse the trend and restore this once-great fishery.

I support the following options from Draft Amendment 7:

#### 4.1 Management Triggers

##### TIER 1 OPTIONS: Fishing Mortality (F) Triggers

– Option A: Timeline to Reduce F to the Target

**I support Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year. The board needs to move as quickly as possible to get below the target, at all costs.

–Option B: F Threshold Triggers

**I support Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

–Option C: F Target Triggers

**I support Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

##### TIER 2 OPTIONS: Female Spawning Stock Biomass (SSB) Management Triggers

–Option A: Deadline to Implement a Rebuilding Plan

**I support Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must

implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment.

–Option B: SSB Threshold Trigger

**I support Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

–Option C: SSB Target Trigger

**I support Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

TIER 3 OPTIONS: Recruitment Triggers

–Option A: Recruitment Trigger Definition

**I support Sub-option A3:** The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model (NY, NJ, MD, VA) shows an index value that is below the median of all values in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years. The high recruitment reference period used for this trigger may be adjusted as recommended by the TC during benchmark stock assessments. This trigger alternative has a higher sensitivity than both the status quo trigger and sub-option A2 (Figure 1). This trigger alternative would have tripped six times since 2003: NY in 2006; MD in 2008; MD in 2009; MD and VA in 2010; NY in 2013; MD in 2014 (Table 2).

–Option B: Management Response to Recruitment Trigger

**I support Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

TIER 4 OPTIONS: Deferred Management Action

**I supports Option A (status quo):** No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

4.2 Recreational Fishery Management Measures

Option B. Effort Controls (Seasonal Closures)

**I support Sub-option B2.** Spawning Area Closures: The Board can select either or both of the following sub-options B2-a and B2-b. Multiple states currently have spawning closures in place with closure boundaries defined by those states. Existing spawning closures would be applied toward meeting the requirements of the selected option(s).<sup>15</sup> Spawning area closures during the spawning season could contribute to stock rebuilding by eliminating harvest and/or reducing releases of



spawning and pre-spawn fish. Reducing releases during this time is particularly important to reduce stress and injury to fish as they move into lower salinity spawning areas. If new information on the timing of striped bass spawning is available in the future, the TC would conduct a review of that research and recommend changes to the timing of spawning closures if needed. If this option is selected, CE would not be permitted.

**I support Sub-option B2-b.** No-Targeting Spawning Closure Required: All recreational targeting of striped bass would be prohibited for a minimum two-week period on all spawning grounds (not necessarily the entire spawning area) during Wave 2 (March-April) or Wave 3 (May-June), as determined by states to align with peak spawning. States will determine the boundaries of spawning ground closures. Closures prohibiting recreational targeting on spawning grounds have already been implemented in Maine (Kennebec River), New Jersey (Delaware River), and Maryland (Chesapeake Bay) during part of Wave 2 and/or Wave 3 (Figure 4).

Option C. Additional Gear Restrictions

**I support Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**I support Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

Option D. Outreach and Education

**I support Sub-option D1:** States would be required to promote best striped bass handling and release practices by developing public education and outreach campaigns. States must provide updates on public education and outreach efforts in annual state compliance reports.

## 4.4 REBUILDING PLAN

### 4.4.1 Recruitment Assumption for Rebuilding Calculation

**I support Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

### 4.4.2 Rebuilding Plan Framework

**I support Option B:** 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 recruitment assumption specified in Amendment 7) 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.

## 4.6 ALTERNATIVE STATE MANAGEMENT REGIMES

### 4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option B. Restrict the Use of Conservation Equivalency Based on Stock Status

**I support Sub-option B1-a.** Restrictions: CE programs would not be approved when the stock is at or

below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

#### 4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals

**I support Sub-option C3:** CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30.

#### 4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries

**I support Sub-option D3:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 50%.

#### 4.6.2 Management Program Equivalency (Conservation Equivalency or CE) | Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries

**I support Sub-option E2:** Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state-specific level.

I sincerely hope The Board will take action to correct the current decline of the Striped Bass population via Amendment 7. The bass were pushed to the brink in 80's and we cannot let that happen again.

Thanks for taking the time to read my comments.

Dave Surdel  
6 Bayberry Rd  
Acton, MA

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**From:** [Ryan Zwick](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Monday, April 11, 2022 11:48:09 AM

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As a diver I am in the striped bass world for many hours a week and the decline I have witnessed of their presence the last few years is depressing. Please act now and save these fish before it is too late. We no what inaction looks like, we have seen it before in the 80s and we know what action can do, their recovery had been amazing!

**From:** [Robert Kutcher](#)  
**To:** [Comments](#)  
**Subject:** [External] Anglers thoughts  
**Date:** Monday, April 11, 2022 11:09:00 AM

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My name is Bobby Kutcher I'm from New Jersey. I fish mostly Raritan bay /Sandyhook and once a year I go to Montauk for a week. I through plugs I use the flyrod and I also go to the dark side and throw live eels. I have a few thoughts . One is we need more law enforcement out there. I never see a game warden . Guys aren't scared to keep more then the limit because they know no one is watching.

I also think in the spring it should be 100percent catch and release. This to me is the most important time to release the fish. I know it's going to be hard for guys to understand that but if we don't do something seriously drastic we my loss these fish for good. I'm so glad we have guys out there that can fight for us guys who are shy or just don't have the words to express how we feel. Thank you and if there's anything I can do in my area to help please contact me. Thanks again

Sent from my iPhone

**From:** [Sandra Atkin](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7)  
**Date:** Monday, April 11, 2022 11:04:34 AM

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I have been fishing for striped bass since 1978. I am one of the recreational fisherman identified in 1.1.1.2 whose intent is to catch and release striped bass. It is true that last year I caught less fish, 401 myself and 580 for the boat. I track each days catch and once I begin fishing am out there every day the weather and the access to bait allows. I would be fine with catch and release but limiting the season would be a detriment to many, marinas, bait shops, restaurants, my mental health etc. It may not be worth putting my boat in the marina if the season were shortened by two weeks since the season is only 4 or 5 weeks where I fish out of Newburgh on the Hudson River. I get excited when the season nears and sad when it ends. The season changed 5 years ago to limit the size kept to 18" – 28" and over 40" and then to only 18" – 28". I catch many fish over the 28" all of which are released and only keep a few each year for a few friends. Many of the bigger fish are female and it is a pleasure to watch them spawn which adds to the numbers.

Each year the DEC is on the water checking boats and I have had many conversations with them over the years. I have seen those fishing from shore catch stripers and then hide them and do it again with no regard to size or limits. The DEC is cracking down on those fishing from shore and hope that continues.

Thanks for the opportunity to comment.

Thomas R. Atkin  
4 Howland Street  
Chester, NY 10918  
[satkin@frontiernet.net](mailto:satkin@frontiernet.net)  
(845) 469-9395 Home  
(845) 216-8979 Cell

**From:** [David MacIntyre](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Monday, April 11, 2022 10:43:55 AM

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Dear Sirs,

I am adding my voice to ask that you support Draft Amendment 7 because I don't want to see happen what we had to deal with in the sarly 1980s.We can help save the Striped Bass now.BUT WE HAVE TO ACT NOW NOT NEXT YEAR! David MacIntyre,Ipswich,Mass

**From:** [Nat Thompson](#)  
**To:** [Comments](#)  
**Subject:** [External] Comment for Amendment 7  
**Date:** Monday, April 11, 2022 9:59:53 AM

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My name is Nat Thompson and I am an avid surfcaster and fly fisher from the state of Maine. I have been fishing Casco Bay for over sixty years and live on an estuary where I enjoy sightcasting to cruising stripers.. I feel strongly that this fishery needs to be managed for abundance...not for yield. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Nat Thompson  
Scarborough, Maine  
Email: [natpthompson@gmail.com](mailto:natpthompson@gmail.com)

**Nat Thompson**  
**Producer**  
**Greenlight Maine**  
**207-831-8553**





**From:** [Caroline Johns](#)  
**To:** [Comments](#); [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Cc:** [Michael Armstrong](#); [Dan Mckiernan](#); [ray@capecodfisherman.org](mailto:ray@capecodfisherman.org); [Rep. Sarah K. Peake](#); [LOWELL WHITNEY](#)  
**Subject:** [External] Amendment 7  
**Date:** Monday, April 11, 2022 9:39:01 AM

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Hi,

I am writing about Amendment 7 in support of the stance of the American Saltwater Guide Association that is outlined below.

I am a catch and release angler in Massachusetts who spends almost every Saturday and Sunday in the summer and fall fishing for Striped Bass. It is clear that the fishery is in trouble and needs immediate action to protect this vulnerable stock.

We must act now in order to preserve Striped Bass. Not only is Striped Bass fishing a key passion/hobby for many but it also has important economic impacts on the local community. I spend lots of money each year at local tackle shops and fuel docks. If the population of Striped Bass is not protected they-and a significant chunk of the fishing economy-will disappear.

Please consider this email and the below stance when reviewing Amendment 7.

Thanks,  
Caroline Johns

## 4.1 Management Triggers

The theme to this section is “don’t delay action.” Many of the options included multi-year terms to activate the trigger. We suggest that the bulk of this section stay at “status quo” with a few exceptions. Generally, we like the triggers as they currently stand. What we don’t like is the inaction by the Striped Bass Management Board once a trigger is tripped. Our message on this highly technical section is simple. If we followed the triggers all along, we wouldn’t be in this mess. The biggest problem isn’t the triggers. It is the Board’s not reacting to them.

### Tier 1: Fishing Mortality (F) triggers

#### Option A: Timeline to Reduce F to the Target

**ASGA Supports Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year.

**Rationale:** By reducing fishing mortality to the target within one year, we would be reducing the number of fish removed from the system until that rate is at or below the target.

The only other option, sub-option A2, extends the timeline to reduce fishing

mortality to two years. We have successfully achieved the status quo option two times since the last management amendment in 2003. As we have mentioned, the last thing the board needs is more time to react. Doubling the time to reduce F is not what is best for the resource or the fishermen.

We recognize that there is some uncertainty around only one year of recreational data collected through the Marine Recreational Information Program (MRIP). However, that uncertainty is dwarfed by the uncertainty associated with the Striped Bass Management Board lag in acting to end overfishing if it is indeed occurring.

### **Option B: F Threshold Triggers**

**ASGA Supports Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

**Rationale:** Much like sub-option A, there are only two options for the threshold trigger. B2 added an additional year just like A2 would do for the reducing F to target trigger. On paper, both sub-options A2 and B2 should state a minimum of two years. If the first year for either sub-option is the terminal year of a stock assessment, it could be longer than two years. In fact, it might be 3 or 4 years once the data comes in. For reference, the data used in the stock assessment currently used for decision-making has a terminal year of 2017.

### **Option C: F Target Triggers**

**ASGA Supports Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

**Rationale:** Option C should stay status quo for two reasons. First, to keep in line with the previous two choices in Options A and B. Second, this option denotes a relationship between F and the status of the SSB.

### **Tier 2: SSB Triggers**

#### **Option A: Deadline to Implement a Rebuilding Plan**

**ASGA Supports Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan.** The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

**Rationale:** A two-year response timeline lines up with the requirements for fish managed by the regional councils that operate under the requirements of the Magnuson-Stevens Act. The closer we can get to federal management; the better off

striped bass will be in the long run.

This is a very important facet of Amendment 7 because striped bass were declared overfished in 2018—nearly three years ago—and no rebuilding plan has been established. If this option is accepted, we can avoid this occurring in the future.

### **Option B: SSB Threshold Trigger**

**ASGA Supports Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

**Rationale:** If the stock becomes overfished, we need to address it as quickly as possible.

### **Option C: SSB Target Trigger**

**ASGA Supports Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

**Rationale:** Controlling fishing mortality is the number one tool to ensure stability in the stock. When the SSB declines, we must respond as quickly as possible.

### **Tier 3: Recruitment Triggers**

#### **Option A: Recruitment Trigger Definition**

**ASGA Supports Sub-option A2:** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA) shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

**Rationale:** This trigger needs to be updated. It was never tripped for the coastal stock even though we have experienced some very poor recruitment. It has been tripped once for the North Carolina stock since 2003. That means it is not really a trigger. When you do a retroactive analysis of the performance of A2, it would have been tripped three times since 2003. The other sub-option, A3, would have tripped six times since 2003. That may be too sensitive for management. Meaning that if a trigger is tripped too often it can be easily ignored. A2 seems like the best option. It will show us when recruitment is a concern while not being overly cautious and burdensome to striped bass management.

#### **Option B: Management Response to Recruitment Trigger**

**ASGA Supports Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

**Rationale:** We need to be responsive to recruitment. Lowering F in response to periods of low recruitment is the only way to ensure a stable striped bass population. We have a history of exploiting good year classes and not responding to poor ones. This adjustment to the trigger will make the board more responsive to what science is telling us.

#### **Tier 4: Deferred Management Action**

**ASGA Supports Option A (status quo):** No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

**Rationale:** We cannot delay management actions any longer. Status quo ensures that lengthy delays won't occur if this trigger is tripped.

#### **4.2.2 Measures to Address Recreational Release Mortality**

The overview of this section is mixed for ASGA. We understand and accept that catch and release mortality represents a large portion of the overall fishing mortality. However, anglers release about 90% of the striped bass they catch. That has remained constant for the last four decades. Regulations have changed in the time frame. Large year classes have matriculated through the system, yet we still throw striped bass back as a choice. Therefore, we must manage this fishery for what it is. Striped bass are not black sea bass. Striped bass are not scup. Striped bass are a fish prized by catch and release anglers for the sport and must be treated as such. We do not support any no targeting closures. As long as bluefish swim in the ocean, this is an unenforceable regulation. Law enforcement has stated this fact multiple times.

To make matters worse, we found this on page 60 of Draft Amendment 7.

*Note on Estimating Reduction in Removals: No-targeting closures considered for Draft Amendment 7 are not intended to achieve a specific reduction in removals. Estimating the reduction in removals from a no-targeting seasonal closure depends on assumptions about*

changes in angler behavior, **which is highly uncertain.**

In other words, no targeting closures are currently not possible to quantify. It is hard for us to understand why guides would be expected to give up chunks of their season when ASMFC can not even tell us how many fish we would be saving.

To go a bit further on this topic we also found on page 57 of the document.

*The stock assessment currently applies a 9% hooking mortality rate to all recreationally released striped bass. This does not mean that every time a fish is released alive*

*it has a 9% chance of dying. Under some conditions, the released fish has a higher or lower*

*probability of dying, but overall, coastwide, it is assumed that 9% of all striped bass released*

*alive die.*

What we have here is an admission that the way that many of us fish for striped bass, with single, barbless hooks in cool, clean saltwater, most likely results in below 9% release mortality. This further lowers the assumed impact of no targeting closures. We can not support an option that is not enforceable and offers not quantifiable gains while taking away our ability to operate our businesses.

On paper, we would support sub-option B2-b, a no-harvest spawning closure, if we had more details. The way the sub-option is currently written, we aren't sure what it would do. There are already numerous no-harvest spawning area closures. This sub-option offered little regarding maps detailing the potential closure areas. We suggest that the Striped Bass Management Board address this issue in the addendum that will be started if the stock assessment update in October 2022 tells us we need to curb harvest further. We will have time to address the regulation changes before the 2023 season. The bottom line is that if we are going to do something, let's do it right.

**ASGA Supports Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**ASGA Supports Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

**Rationale for Sub-option C:** ASGA supports both C1 and C2 to address recreational release mortality. Sub-option C1 addresses the use of gaffs. Nets have become lighter and stronger over the years. The nylon mesh has been replaced with material that doesn't remove a fish's protective slime. The current slot limit makes the ability

to safely release a fish even more critical.

Sub-option C2 helps to close a loophole in the circle hook mandate. In the nutshell, this sub-option would require an angler to release a fish that was caught as bycatch and with a J-hook.

#### **Option D. Outreach and Education**

**ASGA: Supports Sub-option D2:** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

**Rationale:** We reached out to several of the ASMFC commissioners and asked their feedback on this issue. Everyone responded that their state was willing and able to meet the needs of this option. ASGA therefore supports D2.

#### **4.4 Rebuilding Plan**

We are in a very bad position with the striped bass stock. When the latest stock assessment was accepted in 2019, we curbed the F rate through Addendum VI. We did not address rebuilding. That means we have less time to get the job done. The poor recruitment in the Chesapeake is making this situation far worse. We don't have good year classes to rely upon.

If you go back in time to 2012, many concerned anglers were ringing the alarm bells about the stock. We knew from the numbers that striped bass SSB would be overfished by 2017. But the numbers for the 2011 year-class showed it was the fourth-best on record. Rather than take a greater-than-30% reduction in harvest, we bet on the 2011 year-class. The Chesapeake, meanwhile, only took a 20.5% reduction. The 2011s were going to save the day. Unfortunately, Maryland decimated the 2011s and the cohort did not recruit to the coastal migratory stock in the numbers we all wanted.

Fast forward to today and it is 2022, three years after a rebuilding plan should have been in place, and we are watching a stock in freefall with no year classes to replace them. What does rebuilding look like now?

In October 2022, we will finally get an update to the 2018 stock assessment. How will we handle this situation? Below is a glimpse into that question. The bottom line is that once again, the inaction of the Striped Bass Management Board has put us in a terrible position. This stock is not being managed for what it is and that is the core of the problem. Striped bass are an economic engine for the entire Atlantic coast. That engine drives an economy that is based on abundance. Tackle shops, restaurants,

hotels, and small-scale manufacturers have been crushed by the pandemic and subsequent supply chain and employment issues. Now, we don't have fish for anglers to catch. This is shaping up to be a disaster for striped bass and the economy they support. We can trace it all back to a few terrible decisions by ASMFC.

#### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

**ASGA Supports Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

**Rationale:** There are two options for rebuilding. One is rebuilding under a normal regime. The other option, B, is called a "low recruitment regime." Option B accounts better for what we are facing. The last three years of recruitment in Maryland's portion of Chesapeake Bay are the worst since 1979-1981.

We should be honest about the situation with striped bass. If we want to rebuild the stock, we must recognize that this needs to be done under a low recruitment assumption. Therefore, ASGA supports Option B.

#### **4.4.2 Rebuilding Plan Framework**

**ASGA Supports Option B:** 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 recruitment assumption specified in Amendment 7) 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.

**Rationale:** What exactly does Option B mean and why do we support it? The update to the stock assessment will come out in October 2022. This information may dramatically change everything we have done through Amendment 7. Option B directs the Board to address these potential needed changes to rebuilding as quickly as possible if the assessment shows that we need to do more. Rather than continue with more delays, we will have the ability to adjust removals before the 2023 season. Without this option, we would lose another year and be backed further into a rebuilding corner. None of this would be necessary if the Board had acted in 2018. But, here we are again.

An additional year could make a lot of difference in the pain we all will face through rebuilding. The only downside to this option is that public comment is limited since time is of the essence. We will still be able to comment in some capacity, but it would



be limited.

While we don't like this situation, we appreciate the motion and its addition to Amendment 7.

#### **4.6.2 Management Program Equivalency**

Management Program Equivalency is also known as Conservation Equivalency (CE). We have been screaming from the rooftops for years about the negative aspects of CE. CE allows states to create their own regulations. The CE process has been systematically abused by several states. It has limited the recovery of striped bass. It has led to states not meeting their conservation goals. It is the root cause of large year classes not contributing to the coastal stock in the volume that was expected. It is one of the leading causes of the current troubled state of striped bass.

*If there is one item you decide to comment on, this one should be it. We must overwhelm the Striped Bass Management Board with our thoughts on CE. This is our chance to put some guardrails on CE and end the abuse of this management tool.*

#### **Option B. Restrict the Use of Conservation Equivalency Based on Stock Status**

**Supports Sub-option B1-a:** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

**Rationale:** CE adds risk to fisheries management. Should we really be assuming that risk if the stock is below the management threshold? We don't think so. This is a simple option that rings true with us.

Flexibility in striped bass management might as well be a four-letter word. We don't need more flexibility. We need to manage this fishery for abundance. There will most likely be a lot of opposition to this option. It is critical that the Board hears your voice.

#### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

**Supports Sub-option C3:** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

**Rationale:** 30% is the precision standard for MRIP estimates that NOAA Fisheries considers reliable. This option would agree with current federal guidance. C1 and C2 would allow for the use of MRIP estimates with up to 50% and 40% PSEs, respectively. We believe those levels bring extra risk to the process. Furthermore,



states ultimately control the PSE associated with the fishery. For instance, a state can lower the PSE by increasing state-run surveys and dockside intercepts. The result of sub-option C3 will be a lower risk as well as improved recreational fishing data. That creates a win-win for fishermen as well as the resource.

### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

**ASGA Supports Sub-option D2:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

**Rationale:** What is an Uncertainty Buffer? If a state decides to use CE, there is a level of uncertainty that should be factored into management. As an example, if states are required to lower harvest by 100 fish, a state that uses CE would have to come up with a plan that would curtail harvest by 25% more, or 125 fish. We have used the term "luxury tax" to describe this.

The fact that this option is in Amendment 7 is validating. If CE wasn't a problem, we would not see this in Amendment 7. It will make states think about using CE because it will cost them more on the front end. We originally advocated for accountability on the back end. If a state exceeded harvest, they would have to pay for it the next year. In some ways this is better because it will make them stop and think before they submit their plans.

Sub-options D1 and D3 would establish buffers of 10% and 50%, respectively, while D2 sits in the middle at a 25% buffer. If you look at the performance of some states that use CE, the 25% number because more justifiable.

### **Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

**ASGA Supports Sub-option E2:** the percent reduction/liberalization projected for the FMP standard at the state-specific level.

**Rationale:** What the heck does this mean? We are going to call this the New Jersey Rule. Why? Because during the Addendum 6 process, we needed to take a coastwide reduction of 18.5% to end overfishing. The slot limit meant different things for different states. States that harvest more have to take more of a reduction. Take a look at the numbers and this will become clear.

Table 1 Description automatically generated



During the Addendum 6 process, the coastal regulations translated into a 40%+ reduction for New Jersey and a minimal reduction for states like Maine and New Hampshire. New Jersey felt this wasn't fair. New Jersey said everyone should take an 18.5% equally. This was brought up at the end of a long day. Many on the Board did not fully grasp the ramifications.

The board voted for New Jersey and allowed each state to take an 18.5% reduction instead of the coastwide numbers. We are very lucky that we met the coastwide reduction of 18.5%. However, not only did New Jersey not meet their goals, but they also ultimately took no reduction, the worst showing for any state.

Therefore, we must select option E2. It was put in this document specifically to address what is described above. We can't let this happen again

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**Caroline Johns**  
Cell: (508) 317-3682

**From:** [Josh Cohn](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Striped Bass PID  
**Date:** Monday, April 11, 2022 9:16:08 AM

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My name is Josh Cohn, I primarily fish for striped bass in Maryland waters, and the Potomac River. Though I run up the coast to follow the fish whenever the opportunity arises.

I would love these fish to be managed similar to Florida Snook as they are the pinnacle of sportfish management that allows for the keeping of some fish, but prevents fishing over large concentrations of spawners.

Please work to eliminate or hem in CE. Please enact the coast wide minimum size of 35" as was overwhelmingly supported by public comment last time around. Please work to stop commercial netters of gizzard shad from leaving large groups of spawning bass in nets overnight.

Climate change continues to give us dry and warm springs, we cannot rely on another strong year class to come and save us. Bioaccumulation makes the larger older fish less fecund than the new spawners which are subject to the slot. We need to protect the year classes we have and to push those who want to continue to eat striped bass through this biomass low to eat landlocked fish.

Striped bass are the Atlantic Salmon of the Mid Atlantic. They are perfectly designed to be destroyed by industrialization and yet they're still here in some numbers despite pollution, poaching, pressure, climate, dams, nets and everything else. All they need is half a chance. Please let us give it to them. This is the ASMFC's only conservation success story—it would be crushing to lose what is left of that progress.

Thank you for your time and work to recover striped bass..

JC

--

Josh Cohn

(202) 689-4196 | [Joshccohn404@gmail.com](mailto:Joshccohn404@gmail.com)

**From:** [Peter Crommett](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Monday, April 11, 2022 9:04:41 AM

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Hi Commission,

I'm another concerned Northeast angler that has been compelled to share my comments with the decision makers holding in their hands the fate of our favorite game fish.

I've been closely following Amendment 7, the hearings and public discussions, and believe we're in a great position to really make some positive changes to help this fishery flourish for years to come.

With that said, here are the Options I'm supporting:

Management Triggers

Tier 1

Sub Option A1: Timeline to Reduce F to the Target

Tier 2

Sub Option A2: Deadline to Implement a Rebuilding Plan

Tier 3

Sub Option A3: Recruitment Trigger Definition

Recreational Fishery Management Measures

Effort Controls: Suboption B2

Pete

**From:** [rkiombetti@kiombettiassoc.com](mailto:rkiombetti@kiombettiassoc.com)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass  
**Date:** Monday, April 11, 2022 8:31:51 AM

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I personally feel that striped bass (along with many species of fish and animals) are under tremendous stress right now. Fishing pressure, development, environmental changes, technology, and many other factors are having detrimental impacts on striped bass and other species.

Therefore my recommendation and hope, is that the management board makes conservation of the species, and rebuilding the population, as their most important objectives. I am personally onboard with whatever measures are necessary to achieve those two goals as quickly as possible.

Sent from my iPhone

**From:** [Jeff Perry](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Monday, April 11, 2022 7:46:14 AM

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I support amendment 7.  
Stripers are a valuable resource(s) which need protection.  
Pass Amendment 7.

Jeff Perry  
19 Partridge Run  
Charlestown RI 02813  
401-789-9274

[Sent from the all new AOL app for iOS](#)

**From:** [Thomas Contrelli](#)  
**To:** [Comments](#)  
**Subject:** [External] Comment for Amendment 7  
**Date:** Sunday, April 10, 2022 11:14:08 PM

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My name is Thomas Contrelli and I am an avid surfcaster from the state of New York. The Striped Bass fishery represents a not only a resource for recreational and commercial fishing. But a part of the ecological responsibility we have as a whole as humans to protect and preserve wildlife as we inevitable interfere with our presence. Not only to maintain a balanced ecosystem but to also maintain the waters and their importance to our lives for generations to come. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.



Sincerely,

Thomas Contrelli  
Miller Place, New York  
Email: [archer56035@aol.com](mailto:archer56035@aol.com)

**From:** [Rick Zappala](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7 Comments  
**Date:** Sunday, April 10, 2022 10:45:58 PM

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To: ASMFC Management Board

From: Rick Zappala

Date: April 10, 2022

RE: Proposed Amendment 7 Comments

I would like to provide my comments regarding the proposed Amendment 7 for the management of striped bass. Although this document was very technical, I have been able to get through it well enough to know which options I support.

My choices are as follows:

4.1 Management Triggers

Tier 1: A1; B1; C1

Tier 2 Spawning Biomass Triggers

A2; B1; C1

Tier 3 Recruitment Triggers

A2; B2

Tier 4 Deferred Management Plan

A No deferral

4.2.2 Measures to Reduce Recreational Release Mortality

C1; C2 and D2

4.4 Rebuilding Plan

4.4.1 Recruitment Assumption for Rebuilding Calculation

B

4.4.2 Rebuilding Plan Framework

B

4.6.2 Management Program Equivalency

B1-a; C3; D2; E2

Thank you for consideration of my comments. Please act quickly as our striped bass fishery is in trouble. It would be a shame if we do not bring this truly American fish back to a healthy, abundant state.

Thank you

Rick Zappala  
2128 Dogwood Ln  
Westbury NY 11590

"be the change you wish to see in the world..." Gandhi

**From:** [Kenneth Holt](#)  
**To:** [Comments](#)  
**Subject:** [External] Public comment  
**Date:** Sunday, April 10, 2022 9:20:00 PM

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4/10/22

To whom it may concern;

I am writing with the hopes that my voice can join the voices of others in support of conservation efforts to assist in restoring striped bass stocks to abundance. My name is Ken Holt and I am a recreational fisherman. I am a fly fisherman and I rarely keep striped bass for the table. I am not, however, naïve in the sense that I know that there is mortality even in catch and release and even from fly fisherman using single hooks. I am alarmed by recent declines in the striped bass stocks and am old enough to remember the last time the population collapsed. It is my sincere hope that steps can be taken immediately with the aim to prevent this from occurring again.

I realize that there is significant finger pointing when searching for the reasons we are in the situation we find ourselves in. Recreational fisherman blame commercial fisherman who respond by pointing out (rightly so) that recreational fisherman, poachers and even well intended C&R fisherman are responsible for an outrageous number of dead stripers every year. I also am keenly aware that due to the migratory nature of striped bass, regulation to protect the fish and thereby preserve the fishery is a near impossible task since it requires the cooperation of multiple states along the migratory routes.

I am no expert and will not attempt to write a letter that would imply that I am. I am writing, however, with sincere and heartfelt conviction that conservation efforts aimed at restoring the population of striped bass needs to be at the center of any decisions that are made. In my understanding of current terminology, we should be managing the fishery aiming for “abundance” While I support the idea of a slot limit, I believe that one of the last strong year classes will be entering the current “slot” passing a minimum of 28”s right now. I support a shift in the slot to protect this population and would also support a more drastic measure of shifting to a tagging system similar to the former Canadian system for Atlantic Salmon. If recreational anglers were issued a limited number of tags for each year and sufficient funding were set aside to fund increased efforts to patrol and enforce regulations, I believe a significant dent could be made in our current striper mortality problem. Additionally, education on appropriate catch and release methods needs to be encouraged and supported both publicly and privately.

As best I understand them, my views on the specifics are as follows:

4.1

Tier 1 – A, A1; B, B1; C, C1

Tier 2 – A, A2; B, B1; C, C1

Tier 3 – A, A3; B, B2

Tier 4 – A

4.2

B, B2-b

C, C1, C2

D, D1

4.4.1 – B

4.4.2 – B

4.6.2

B, B1-a

C, C3

It has been my personal and professional experience that when decisions are made by government or quasi-governmental agencies, the process is lengthy, inefficient and all too often subject to the influences of entities who are NOT interested in preserving our environment and natural resources. Please act swiftly and in a way that ensures the protection and restoration of the striped bass populations. As an avid fisherman, I am aware that such a request will require sacrifice and I support the steps necessary to protect this fishery.

Thank you for your time and consideration.

Sincerely,

Ken Holt

Sent from [Mail](#) for Windows

**From:** [blackdogtrainer@aol.com](mailto:blackdogtrainer@aol.com)  
**To:** [Comments](#)  
**Subject:** [External] Comment for Amendment 7  
**Date:** Sunday, April 10, 2022 8:23:54 PM

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My name is Ronald Contrelli and I am an avid surfcaster from the state of New York. This is the number 1 gamefish on Long Island. It is important to protect this species, so that not only I can enjoy catching this species but my kids and grand kids. The striped bass is in real trouble. Lets get this right this time. Lets manage it for abundance Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Ronald Contrelli  
Miller Place, New York  
Email: [blackdogtrainer@aol.com](mailto:blackdogtrainer@aol.com)

**From:** [dennis mitchell](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass PID  
**Date:** Sunday, April 10, 2022 7:30:55 PM

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I am commenting on the proposed striped bass Amendment 7.

My name is Dennis Mitchell, I am an avid striped bass fisherman, and deeply care about the future health of the fishery. I've lived through the good days of the late 90's and 2000's, and believe the Amendment 7 choices I've outlined below are our best options for doing what is best for the health of the fishery as a whole. I believe they offer our best hope of stabilizing the decline we've been in for nearly the last 15 years, and to start rebuilding the population to something approaching what we used to experience.

#### **4.1**

##### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

##### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

##### **Tier 3**

Option A- Support A3

Option B- Support B2

##### **Tier 4**

Support A

#### **4.2**

Option B- Support B2-a\* If it existed I'd pick an option for artificial use only as it would significantly decrease mortality IMHO.

Option C- Support C1, C2

Option D- Support D1

#### **4.4.1**

Support B

#### **4.4.2**

Support B

#### **4.6.2**

Option B- Support B1-a

Option C- Support C3

Option D- Support D3

Option E- Support E2

Thanks for the opportunity to comment on Amendment 7.

Dennis Mitchell  
1537 Marlboro Rd.  
West Chester, PA 19382



**From:** [Michael Louie](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Sunday, April 10, 2022 1:15:50 PM

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To the esteemed Commissioners of the ASMFC,

Once again I am writing to you regarding the management of striped bass. I am a recently transplanted New Yorker who fished the waters of Breezy Point to Silver Point, from Caumsett to boulders of Caswells. I spend parts of the season fishing for striped bass on Peaks Island, Maine and the Indian River Inlet in Delaware. I am now navigating the surf fishing spots of Raritan Bay and the New Jersey shore. While the boats and kayakers in Raritan Bay appear to be enjoying their share of big striped bass for now, this is a critical moment for management, and an important opportunity for the ASMFC to take meaningful (and positive) action.

I am a member of the Brooklyn Urban Anglers Association. Since 2009 we've worked to educate the public on the value of New York City's waterways and conservation issues regarding menhaden and striped bass. For years we have submitted letters advocating for responsible management of our fisheries, and for years we've been frustrated by the pace of the Commission's actions. I am frustrated by the Commission's lack of commitment to their own management triggers. I am frustrated by the Commission's repeated failures to keep states, like New Jersey and Maryland, accountable. I am frustrated by the Commission's commitment to allow loopholes and workarounds like "Conservation Equivalency" in place, knowing full well that states use this to abuse the system.

**—Regarding section 4.6.2: Management Program Equivalency, specifically Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

I stand with the American Saltwater Guide Association. I support Sub-option B1-a: CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

**—Regarding 4.4.1 Recruitment Assumption for Rebuilding Calculation:**

I support Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

**—Regarding 4.4.2 Rebuilding Plan Framework:**

I support ASGA here as well: Option B. 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 recruitment assumption specified in Amendment 7) 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.

**—Regarding 4.1 Management Triggers  
Tier 1: Fishing Mortality (F) triggers**

### **—Option A: Timeline to Reduce F to the Target**

I support Sub-option A1 (status quo): Reduce F to a level that is at or below the target within one year.

### **—Option B: F Threshold Triggers**

I support Sub-option B1 (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

### **—Option C: F Target Triggers**

I support Sub-option C1 (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

## **Tier 2: SSB Triggers**

### **—Option A: Deadline to Implement a Rebuilding Plan**

I support Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

### **—Option B: SSB Threshold Trigger**

I support Sub-option B1: If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

### **—Option C: SSB Target Trigger**

I support Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

## **Tier 3: Recruitment Triggers**

### **—Option A: Recruitment Trigger Definition**

I support Sub-option A2: The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA) shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

### **—Option B: Management Response to Recruitment Trigger**

I support Sub-option B2. If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

#### **Tier 4: Deferred Management Action**

—I stand with the ASGA here. Option A (status quo): No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger. The can has been long kicked far enough down the road.

I also support **Sub-option C1 in section 4.2.2: Measures to Address Recreational Release Mortality**. Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass. Gaffing is a wholly unnecessary option.

Time is running out for striped bass. I expect the ASMFC to fulfill its charter and protect the resource for future generations, and not sell out for short term gains and settle for status quo to appease two or three unscrupulous states (my current state being one of those). This is your opportunity to make it right.

Thank you for your time.

Michael Louie  
New Jersey 07040

**From:** [Dom Dave](#)  
**To:** [Comments](#)  
**Subject:** [External] Comments for amendment 7  
**Date:** Sunday, April 10, 2022 12:47:52 PM

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Dear asmfc,

Please save the striped bass!

In summary, we want more fish of every size in more places asap. Strict management and action is greatly needed. Moratorium may be necessary if things don't change now.

Fishing has become harder and harder over the last ten years. The angling community has been crying out for stricter conservation for far too long.

My option choices are below.

#### **4.1**

##### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

##### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

##### **Tier 3**

Option A- Support A3

Option B- Support B2

##### **Tier 4**

Support A

#### **4.2**

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D1

#### **4.4.1**

Support B

**4.4.2**

Support B

**4.6.2**

Option B- Support B1-a

Option C- Support C3

Option D- Support D3

Option E- Support E2

Thank you,

Dave Fox - Surfcaster

Nesconset, NY

**From:** [Dominic DeFlumeri](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 comments  
**Date:** Sunday, April 10, 2022 12:41:07 PM

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To the commission

Thank you for hearing us and listening over the past two years.

My info:

Name & Residence:

Dominic DeFlumeri

Massapequa Park, NY

Type: Surfcaster & business owner (surfcasting gear) - not affiliated with any clubs or organizations

Location: I fish from Cape Cod to Montauk. Mostly consisting of Long Islands ocean front beaches, back bays, and the sound.

My option choices are listed below. I have also provided a brief synopsis of additional comments below.

#### **4.1**

##### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

##### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

##### **Tier 3**

Option A- Support A3

Option B- Support B2

##### **Tier 4**

Support A

## 4.2

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D1

### 4.4.1

Support B

### 4.4.2

Support B

### 4.6.2

Option B- Support B1-a

Option C- Support C3

Option D- Support D3

Option E- Support E2

### **Additional comments:**

· This public info document for Amendment 7 was long, complex and frankly a chore to read and understand. For the general public's sake please consider simplifying such documents in the future. I'm afraid the nature of this current amendment document has prevented people (rec. and commercial) from engaging.

· Please, act fast and in accordance with science and the majority's wishes: do not delay or we will lose this fishery forever. We will also lose face as a community and lose even more faith in the ASMFC priorities.

· Always Manage for abundance! Not for yield or economic reasons. Lowering the benchmark for total biomass should never be an option.

· Please use foresight when making any managerial decisions and taking action. What good is a large yield this year if we're decreasing the biomass and therefore the yield in coming years. The more fish we let die (harvested) the less chance of a good spawn we have.

• The ASMFC must act quickly, decisively, and with abundance as priority. The

fishery must be rebuilt in less than 10-years, please do so at all costs, using immediate and aggressive action and management decisions.

**In summary:**

We as the public (rec and commercial) all want the same thing; more fish of all sizes in as little time as possible.

I personally hope we can turn this fishery around and once again have a thriving inshore striped bass population. Even if it means a years long moratorium!

Please consider working with enforcement to **greatly increase penalties for poaching** of striped bass, they are far to lenient and currently don't do enough to keep people (rec, for-hire and commercial) from poaching. Especially for party and large charter boats, crews and captains tend to look the other way when poaching is occurring on their vessel. **Strict penalties (financial and administrative) for captains of said vessels will put an end to this immediately.**

Thank you for the opportunity to comment, together we can save our beloved striped bass for generations to come.

Sincerely

Dominic DeFlumeri

Massapequa Park, New York

**-Dominic • DBS**  
**Dbssurfcasting.com**



**From:** [jtomici@optonline.net](mailto:jtomici@optonline.net)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Sunday, April 10, 2022 11:29:46 AM

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To members of the ASFMC,

My name is John Tomici and I'm a surf fisherman from the north fork of Long Island and I have enjoyed the challenge and excitement of catching striped bass for many years. At most, I may keep 1 legal size bass per season and try to safely release the rest.

I want to ensure that this fishery can overcome the current pressures it is being subjected to and begin to thrive so I can continue to enjoy this hobby with other responsible anglers well into my retirement and with my children and grandchildren for years to come.

I hereby submit my recommendations for Amendment 7, focused on managing for abundance, educating the public and encouraging conservation tactics by industry, and eliminating conservation equivalency options by state.

#### **4.1 Management Triggers**

Tier 1:

- Sub-option **A1**
- Sub-option **B1**
- Sub-option **C1**

Tier 2:

- Sub-option **A2**
- Sub-option **B1**
- Sub-option **C1**

Tier 3:

- Sub-option **A3**
- Sub-option **B2**

Tier 4:

- Option **A**

#### **4.2 Measures to Address Recreational Release Mortality**

- Sub-option **B2**
- Sub-option **C1, C2**
- Sub-option **D2**

#### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

- Option **B**

#### **4.4.2 Rebuilding Plan Framework**

- Option **B**

#### **4.6.2 Management Program Equivalency**

- Sub-option **B1-a**
- Sub-option **C3**

Sub-option **D3**

- Sub-option **E2**

Please consider my comments when finalizing Amendment 7.

Regards,

John Tomici  
1530 Wells Avenue  
Southold, NY 11971

**From:** [Vincent Catalano](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Sunday, April 10, 2022 11:27:01 AM

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Hello,

We are at a critical time for striped bass. I urge you for the future of these fish to start managing for abundance and a healthy stock for the future... Our upcoming year classes are at a all time low so we NEED to protect what we have to stand a chance moving forward with striped bass

I support :

FISHING MORTALITY:

SUB OPTION A1

SUB OPTION B1

SUB OPTION C1

SPAWNING STOCK BIOMASS

SUB OPTION A2

SUB OPTION B1

SUB OPTION C1

RECRUITMENT TRIGGERS

SUB OPTION A2

SUB OPTION B2

DEFERRED MANAGEMENT ACTION

OPTION A

SUB OPTION C1

SUB OPTION C2

SUB OPTION D2

OPTION B

SUB OPTION B1-A

SUB OPTION C3

SUB OPTION D2

SUB OPTION E2

PLEASE let's do the right thing and save these fish, we owe it to them...

Thank you

--

Capt Vinny Catalano

631-766-1695

[www.longislandflyfishing.com](http://www.longislandflyfishing.com)

[www.joeyccharters.blogspot.com](http://www.joeyccharters.blogspot.com)

IG : @LONGISLANDFLYFISH

**From:** [Betty Perrino](#)  
**To:** [Comments](#)  
**Subject:** [External] Fwd: Draft Amendment 7  
**Date:** Sunday, April 10, 2022 10:44:37 AM

---

## **Subject: Draft Amendment 7**

I write to the commission urging rapid action to repair the damage to the striped bass fishery that has occurred over the past ten years. As a Delaware resident I have invested in vacation home real estate in Bethany Beach, sport fishing boats and equipment, rentals, restaurants and other services in our coastal communities. My family would come to Delaware on vacations to enjoy the wonderful fishing our state offered. Currently the striper fishing pales in comparison to that of two decades ago. In fact, your own commission's report confirms my findings. This commission has been too slow to take action and too reckless with our fish. And recreational anglers and our communities are suffering. Below I have listed management options the ASMFC should adopt in Amendment 7 to repair this damage done:

On 4.1 Management Triggers, I support:

- Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality
- Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold
- Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions
- Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, I support:

- Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method
- Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, I support:

- Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. I recognize this option may require more restrictive management measures than option A, which I support

On 4.4.2 Rebuilding Plan Framework, I support:

- Option B to allow the Board to take direct management actions as Ill as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, “Management program equivalency (also known as “conservation equivalency” or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

I believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically, I support:

- Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level
- Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates
- Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries
- Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

Best Regards,

Elizabeth Perrino  
Heather Lane  
Bethany Beach, Delaware

**From:** [James Valle](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7)  
**Date:** Sunday, April 10, 2022 9:51:22 AM

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Emilie Franke, FMP Coordinator

Sir,

I am a NJ Catch and Release surf fly fisherman and Vietnam Vet.

At 75 and a long term Striped Bass fisherman I have watched the decline of our NJ fishery continue year after year.

It's pathetic....!

All I am asking you to do is to stop the games, regardless of the \$\$\$, do what is Right for our future generations and get the job done.

*I want my grandchildren to have the experience of landing a stripped bass in the surf!*

*I support the Saltwater Guides position on the amendments*

4.6.2 Management Program for Equivalency

o Option B Restrict the use of CE based on stock status

▪ Suboption B1-a

o Option C Precision Standards

▪ Suboption C3- ensures a higher level of precision in surveys by states

o Option D CE uncertainty buffer-

▪ Suboption D2- if you are going to allow CE, there should be a greater certainty that the goals shall be reached

o Option E Definition of Equivalency for Conservation Programs

▪ Suboption E2- Statewide level of reduction • This is where New Jersey really abused the system. If the

coastwide goal was to reduce the harvest of striped bass by say 20% (from 1,000,000 to 800,000 fish) New Jersey said that because more than 50% of the catch comes from NJ, they actually would be responsible for 100,000 of those fish and that be too high a burden so they wanted to reduce their states catch by 20% of the 100,000 fish they catch or only 80,000, ie 20,000 less than the coastwide mandated for NJ. This option

would no longer allow this to happen again.

*Jim Valle*

Fly Fishers International  
Certified Master & Two Hand Casting Instructor  
CI, THCI, MCI, BOGE

**From:** [Matthew Hetterich](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Sunday, April 10, 2022 9:31:16 AM

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Good morning,

As a lifelong saltwater angler and fishing tackle business owner, I wanted to reach out regarding Draft Amendment 7 to the Interstate Fishery Management Plan (FMP) for Atlantic Striped Bass.

I've watched the striped bass fishery decline steadily here in New York for the past 15-20 years, but especially the past 5. Every season I say to myself "it can't get worse", and unfortunately, it does. The resident fish we used to see throughout the season in different locations across Long Island are no longer here. Biomasses of fish are concentrated in specific areas where they are subject to extreme pressure from both sides of the fishery (recreational and commercial interests). Without changes to produce realistic conservation goals, I'm concerned the fishery will continue to decline to a point that striped bass are non-existent on Long Island.

My suggestions for achieving conservation goals are in line with the comments put forth by the American Saltwater Guide Association (ASGA). I feel these options best support protecting our precious gamefish and responsibly rebuild the fishery. I've included the link here; <https://saltwaterguidesassociation.com/wp-content/uploads/2022/03/ASGA-A7-POSITION-FINAL.pdf>

Thank you for your help and protecting our gamefish.

Matt Hetterich

Eastern Rodworks, Inc.  
Sound Beach, New York



**From:** [max capshaw](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Sunday, April 10, 2022 8:35:38 AM

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Dear Emillie Franke

As a resident of Connecticut and recreational angler who cares deeply about the future of Striped Bass, I urge you and the ASMFC to take definitive action to preserve and improve the Atlantic striped bass fishery. In my view, there should be a complete moratorium for both recreation and commercial harvest.

However, since you have rejected this idea, I demand action and accountability that makes conservation of the species, and rebuilding the population, as the most important objective. I implore you to take action now to save the striped bass and preserve this resource for my children and future generations!

Sincerely,  
Max Capshaw, PhD  
Ridgefield, CT

**From:** [Dale](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.cc](mailto:stripercomments@gmail.cc)  
**Subject:** [External] Amendment 7  
**Date:** Saturday, April 9, 2022 11:06:21 PM

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My name is Dale E Wilcox. I would like to forward my opinions regarding the ASMFC Draft of Amendment 7. I am a retired US Navy Captain who lived in the Annapolis, MD area in the 1970's and 80's. My pastimes included eating oysters and crabs, and fishing for Rockfish in the Chesapeake Bay. I couldn't imagine a better lifestyle, but then things began to change. Crabs and oysters began to disappear, and the rockfish population crashed. It took the dramatic closure of the fishery to stop the bleeding. Heartbreak! But as we all know, the effort paid off, and the fishery rebounded in the 90's.

Fast forward forty years, I now live on the Long Island Sound coast of Connecticut, and to quote that famous sage Yogi Berra, "I'm having deja vu all over again".

Because of my Navy background, I am an analytical person, so I will direct my comments specifically to Amendment 7. In closing, however, I would like briefly to address a few additional concerns.

#### Management Triggers

Management Triggers, however complex are important and necessary elements of any fishery management plan. They define the data points which indicate when fisheries managers must take action to improve the condition and density of a stock. The original triggers appeared to be well thought out and established. Unfortunately, I fear that these triggers may have been overlooked, ignored, or manipulated resulting in the breakdown of the management process. Once the new Amendment 7 is developed and approved I encourage the Board to adhere to and act upon the agreed to triggers. I also support the continuation (status quo), of the established fish mortality triggers outlined in Tier 1. I also suggest the following specific options:

- Option A: sub-option A-1. Keep the one-year timeline required for reducing the mortality below the target.
- Option B: sub-option B-1. Retain the use of the timeline in Option A-1 to reduce the mortality below the threshold .
- Option C: sub-option C1. Maintain the established target trigger for the mortality and spawning stock biomass, using the Option A timeline adopted.

I support these specific options for the Tier 2 Female Spawning Stock Biomass (SSB) Management Triggers.

- Option A: sub-option A2. Require the development and implementation of a stock rebuilding plan.
- Option B: sub-option B-1. The rebuilding plan outlined in Option A should attempt to rebuild the stock within a 10 year timeframe.
- Option C: sub-option C-1. This would maintain the current SSB trigger requiring the stock rebuild within 10 years.

I support Option A: sub-option A3 for the Tier 3 Requirement Triggers.

I support Option A: No Deferred Management Action for the Tier 4 Deferred Management Option.

#### Recreational Fishery Management Measures

I support Option B, including the following sub-options

- Option B-2-a. Prohibit the recreational harvest of striped bass from January through April in the Chesapeake Bay spawning areas. I would also prohibit harvest in the Delaware River, Raritan Bay, Hudson River, Connecticut

River, and Thames River spawning areas for a similar timeframe.

I support sub-option D-1 which would require states to implement recreational fishing practices to reduce catch and release mortality. This should be an ongoing effort including an after action review, to evaluate and adjust the practices as necessary.

I support Option B. This will enable the Board to respond quickly to problems which become apparent upon future stock review.

#### Conservation Equivalency

The widespread use of Conservation Equivalency of the striped bass stock, has been much like solving the climate crisis through the use of carbon credits. Poorly planned conservation programs have been subject to limited management control and manipulation, which has resulted in negligible conservation benefit, especially in the midst of a declining striper stock. The rebuild of a coast wide population mandates a joint effort on behalf of all vested parties, requiring similar sacrifices, and reaping similar benefits.

I therefore support Option B : Restrict the Use of Conservation Equivalency Based on Stock Status as well as sub-option B1-a ; Limit the use of Conservation Equivalency while the stock is below threshold.

All vested stakeholders in the striper stock rebuild recognize that Amendment 7 is a very critical part of this effort. I thank the ASFMC Board for considering public input prior to making decisions and management pronouncements. I think that we all recognize that this issue is only a part of the rebuilding puzzle. I therefore encourage the Board to subsequently review the following concerns:

- Evaluation of the commercial management of prey species populations ( Menhaden etc.) as well as regulating use of aircraft to limit removal of large swaths of stock.
- Regulation of the removal of the “breeder” fish, and “bycatch” from the stock by commercial businesses.
- Efficient application of “Slot sizes” to protect advancing year groups. (This is a tough fix).
- Continued effort regarding tagging of Spawning populations and spawning locations, enabling more focused management.

In closing, I would like to thank the Board members of ASMFC for the time and effort all of you invest.

Respectfully,  
Dale E Wilcox

Sent from my iPhone

**From:** [Bruce Gallaway](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7: MA & CT Recreational angler POV  
**Date:** Saturday, April 9, 2022 10:01:09 PM

---

Dear Emillie Franke

As a resident of Connecticut and recreational angler who cares deeply about the future of Striped Bass, I urge you and the ASMFC to take definitive action to preserve and improve the Atlantic striped bass fishery. In my view, there should be a complete moratorium for both recreation and commercial harvest.

However, since you have rejected this idea, I demand action and accountability that makes conservation of the species, and rebuilding the population, as the most important objective.

I implore you to take action now to save the striped bass and preserve this resource for my children and future generations!

Sincerely,

R Bruce Gallaway Jr

Ridgefield, CT

**From:** [leif.gobel](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Saturday, April 9, 2022 9:59:33 PM

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ASFMC,

I caught my first Striped Bass in 1964 at the age of 8. When I was 14 this fish became an obsession and has remained so to this day. I'm 66 this year and I'm still fishing the surf 5 night's a week during the season.

In the 70's and 80's the fish was declining and some concerned people were calling for strict regulations. I'll be honest when I was a young man at that time I didn't fully understand what people were talking about. I was able to catch bass but not in any quantity. I had been to young to have experienced anything from the 60's like older fishermen had and they told me about great numbers of bass and also an abundance of large fish during that time.

Then in 1986 I saw a coast wide shut down with a moratorium. Although NY only closed it for 1 season many other states had it closed for several more. When states reopened the fishery they put strict size limits ranging from 33 to 36 inches and made it a one fish possession.

All this new regulation on the bass brought a sudden great abundance by the mid 1990's. I remember being on my 2 week vacation in Montauk in the fall of 1995 and witnessing and experiencing daytime bass blitzes daily. This went on for my whole vacation and lasted another few weeks after. I had been fishing Montauk by this time for over 20 years and never saw this fantastic fishing before. It was obvious that the moratorium and then the size and procession limits had worked.

For me this amazing fishing lasted until about 2010. By that time the daytime blitzes in Montauk were not what they had been and I could see that the bass was in decline again.

Now with Ammendment 7 the ASMFC should have taken opportunity to educate the public on the options in the Ammendment and put these options out with a guide. Not doing so eliminates many from participating in the process.

With all this said here's the options that I support.

### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

### **Tier 3**

Option A- Support A3

Option B- Support B2

### **Tier 4**

Support A

## **4.2**

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D1

### **4.4.1**

Support B

### **4.4.2**

Support B

### **4.6.2**

Option B- Support B1-a

Option C- Support C3

Option D- Support D3

Option E- Support E2

The bass fishery needs to be managed so there's a return to great abundance and a full range of

sizes from schoolies to jumbo sizes. If I'm lucky and take care of myself maybe I'll be around to witness another come back of this great fish.

Thanks for receiving and considering my comments.

Leif Gobel

1100 N. Sea Dr.

Orient NY 11957

Sent from my Verizon, Samsung Galaxy smartphone

**From:** [Mike](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Saturday, April 9, 2022 8:44:33 PM

---

We need to make the striper a “game fish” and put in a 0 fish limit for 2 years.  
Thank you, Mike

Sent from my iPhone



**From:** [g.georgetthenrich@comcast.net](mailto:g.georgetthenrich@comcast.net)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment 7- PISC  
**Date:** Saturday, April 9, 2022 2:31:13 PM

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Emilie Franke  
Atlantic States Marine Fisheries Commission

Ms. Franke:

My name is Georgette Henrich and I am the president of the Plum Island Surfcasters, a fishing club of about 400 members based on Plum Island and Newburyport. I have been fishing this area for almost 40 years having weathered the decline of the bass fisheries in the 1980's only to see this decline again. It is apparent both recreational and commercial fishermen contribute to this decline. Lack of education with regard to successfully landing and releasing fish along with illegal harvesting all contribute to fish mortality. The illicit activity of keeping fish outside of the slot limit and or more than daily limits by those who fish the Cape Cod Canal is only a fraction of what goes on along the coast. I fear that the measures put forth by Draft amendment 7 will be very little to conserve the Striped Bass fishery. We need better law enforcement with stiffer penalties for offenders. When I hear that only one officer patrols miles and miles of beach, I have to ask how is that effective in preventing poachers from taking breeder bass?

We also need better education on how to preserve the Striper fishery. My club strives to enlighten and educate our members on how they can be a steward of the environment. We have changed our tournaments to catch and release only and encourage our members to do so at every opportunity. We hope other clubs do the same thing and that the general public is aware of the dire straits Striped Bass face.

Below are my selections for how I think Draft amendment 7 should proceed. It is my hope that these provisions help to reverse the damage done over the past two decades and to restore what we had for future generations.

Regards,

Georgette Y. E. Henrich  
President, Plum Island Surfcasters<sup>sm</sup>, Inc.  
Founded 1957



*"Plum Island Surfcasters<sup>sm</sup> will strive to be a highly respected leader in sportfishing, committed to developing best practices in good sportsmanship, education, techniques and conservation for future generations"*

Consider donating to our organization: <https://www.plumislandsurfcasters.org/donate-to-plum-island-surfcasters/>

4.1 Management triggers:

**Tier 1 Options:** Fishing Mortality (F) Management triggers

**Sub-option A1**

**Sub-option B1**

**Sub-option C1.**

**Tier 2 Options:** Female Spawning Stock Biomass (SSB) Management triggers

**Sub-options A2**

**Sub-option B1**

**Sub-option C1.**

**Tier 3 Options:** Recruitment Triggers

**Sub-option A3**

**Sub-option B2.**

**Tier 4 Options:** Deferred Management Actions

**Option A.**

4.2.2 Measures to Address Recreational Release Mortality

**Option A.**

*Should require circle hooks for all species to eliminate any question of which species a person is targeting, e.g. "I'm really fishing for bluefish".*

**Sub-option B1-a** *should say harvesting instead of targeting as targeting would be very difficult to enforce. Harvesting would give more tangible results.*

**B2-a**

**Sub-option C1**

**Sub-option C2**

**Sub-option D1**

4.3.2.1 Commercial Quota Transfers

*Recommend current practice of no transfer.*

4.4.1 Recruitment Assumption for Rebuilding Calculation

**Option B**

4.4.2 Rebuilding Plan Framework

**Option B**

4.6.2 Management Program Equivalency

**Sub-option B1-a**

**Sub-option B1-c**

**Sub-option B2-a**

**Sub-option B2-b**

**Sub-option C3**

**Sub-option D3**

**Sub-option E2**



**From:** [Art Howe](#)  
**To:** [Comments](#)  
**Subject:** [External] Drat Amendment 7  
**Date:** Saturday, April 9, 2022 12:57:33 PM

---

Greetings,

I am both a recreational angler for 60+ years and a part-time guide for nearly 30 years on Martha's Vineyard. Personally, I have lost thousands of dollars of income/year over the last 10+ years because of the declining abundance of inshore striped bass. I guide entirely on foot, not by boat. Fortunately for me, I measure success by the totality of the fishing experience, but many clients have been lost due to the low numbers of striped bass caught..

As you deliberate over many options within Amendment 7, let me offer my support for the following:

4-1 Management Triggers:

Tier 1, support sub option A-1, sub option B-1, and sub option C-1

Tier 2, support sub option A-2, B-1,

Tier 3, support A-3, B-2

Tier 4, support option A

4-2 Recreational Fishery Management Measure

Support Sub-option B2

Support Sub-option B2-b

Support Sub-option C1

Support Sub-option C2

Support Sub-option D1

4-4

Support 4.4.1 option B

Support 4.4.2 option B

4.6

Support 4.6.2 sub-options B-1, C-3, D-3, and E-2

Let's take these measures to revitalize this wonderful fisheries for the long term, sustainable benefit of all, especially future generations of children.

I urge your support of the above.

<"(((((((((<

**Art**

Arthur Howe III  
860-324-0422,

**From:** [Donoghue, Conor](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Saturday, April 9, 2022 12:21:30 PM

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To whom it may concern,

As an avid recreational fisherman, it is abundantly clear to me that the current Striped Bass management program currently in place is not working. This past Summer, the big fish never made it to Boston Harbor even like the Summer before that which was worse than the Summer before that.

I appreciate you taking my concern into consideration as we look to implement the proper amendments to maintain this fishery so that I can teach my children to love it the same way my parents taught me.

Thanks

Conor Donoghue  
978-621-7440

**From:** [Ron Zeb](#)  
**To:** [Comments](#)  
**Subject:** [External] Comments on Draft Amendment 7  
**Date:** Saturday, April 9, 2022 10:16:26 AM

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Atlantic States Marine Fisheries Commission:

As a Massachusetts recreational striped bass fisherman, I oppose fishing closures, which would further shorten an already brief season. I do support further restrictions on commercial striped bass fishing.

Thank you.

Ronald Klodenski  
18 Wildwood Drive  
Newburyport, MA 01950

**From:** [Dylan Taillie](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7, Striped Bass PID  
**Date:** Saturday, April 9, 2022 9:33:21 AM

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To the ASMFC:

I strongly believe a change must be made in the management of striped bass to ensure that my children and grandchildren enjoy our public resource in a similar way that I have enjoyed it over the past 30 years. I believe we all deserve better management of this fishery, whether you are a commercial or recreational fisherman, photographer, birdwatcher, kayaker, or just enjoy the occasional striped bass as a menu item. **Better** management and more diverse age classed fish as well as more fish over the age of 15 will benefit not only the economy but will provide memories for millions of Americans along the east coast that will last a lifetime.

What do I mean by **better** management?

- The existing objectives do not balance the need for regulatory consistency, as shown by the decline in female SSB up to 2018, and likely through 2022 (although the lack of data through 2021 doesn't help with the evaluation of objectives).
- A coastwide stock assessment doesn't do a good job of capturing what is happening within each individual state, and some states (such as MD) have had low YOY and recruitment for three years in a row, pointing to regional differences in the effectiveness of the AMFC to manage a healthy striped bass population. Each state should be held to the same high standard, and the ASMFC should assess (scientifically) the success of state management efforts and help to establish commercial and recreational limits in an unbiased fashion.
- The commercial fishery should shut down when commercial quotas have been met, rather than taking them out of next years harvest.
- To reduce recreational mortality, management should reduce effort (close areas during specific times of high mortality such as warm months) and ban treble hooks and other mortality increasing tools.
- A quota (rather than size and bag limit) should be considered for certain fisheries that are not maintaining spawning stocks according to their department of natural resources (MD, for example).
- Maryland should do away with the trophy striped bass season. No state should harvest fish over 35 inches.

Thank you for considering my thoughts. I hope that this fishery can improve for the sake of my neighbors, children, and grandchildren.

Best

Dylan

--

Dylan Taillie (he/him)  
Science Communicator  
[website](#)

(443) 786 9942



**From:** [Gmail](#)  
**To:** [Comments](#)  
**Cc:** [2022stripercomments@gmail.com](mailto:2022stripercomments@gmail.com)  
**Subject:** [External] Comment for Amendment 7  
**Date:** Saturday, April 9, 2022 8:11:22 AM

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My name is Brian Rooney and I am an avid boat and surf fisherman in the state of Rhode Island. As an avid recreational fisherman the sustainability of our Striped Bass resources is of paramount concern. A future where my children and grandchildren are not able to experience the thrill of catching and releasing this top-tier game species is unacceptable, and any action that can be taken now to support sustainability should be enacted. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Brian Rooney  
Narragansett, Rhode Island  
Email: [bandaroon@gmail.com](mailto:bandaroon@gmail.com)

**From:** [captkaos7@gmail.com](mailto:captkaos7@gmail.com)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment 7  
**Date:** Friday, April 8, 2022 10:29:45 PM

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Good evening I hope this email finds you well. I will just cut to the chase. The striped bass regulations are way out of touch. You should stop all bass fishing in the Raritan Bay Area until these breeding fish have a chance to spawn. Most of these breeding class fish die after being released either due to improper handling or total exhaustion of the fish. Let them swim up the Hudson and spawn. Not sure if you have seen what goes on there but it's crazy to think that this has no effect on the striped bass population in our state. This slot limit is a horrible idea as well. When we had a 36" minimum size and one fish per man we had the best bass populations in decades. Then they changed the refs to 28", 2 per man and now we are here. Please take what I say into consideration on this amendment. Thanks for your time.

Sent from my iPhone

**From:** [Atticus Fallon](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 8, 2022 10:19:09 PM

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Please act now to protect northeast striped bass! They are important as a 1) food source 2) a predator and overall food chain component 3) an economic driver (fishing & tourism) and 3) overall cultural pillar of the Northeast.

A healthy ocean helps all of us!

Atticus Fallon

**From:** [Dwane Tracy](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 8, 2022 9:11:47 PM

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My name is Dwane Tracy

Striped Bass fishing has been more than a passion for me over the past 5 years, traveling up and down the east coast targeting this beautiful species. We need to change to a coast wide slot limit to protect the biomass, and we need to act quickly.

My choices for Amendment 7 (management for striped bass) as requested by the asfmc call for public comment.

4.1- Tier 1 A1 B1 C1  
Tier 2 A2 B1 C1  
Tier 4 A

4.2- B none C1 C2 D2

4.4.1- B

4.4.2 - B

4.6.2 - B1-a C3 D2 E2

please act fast to save our striped bass

Thank you

Dwane Tracy

New Jersey

Sent from my T-Mobile 5G Device

**From:** [xyz357@verizon.net](mailto:xyz357@verizon.net)  
**To:** [Comments](#)  
**Subject:** [External] Comments  
**Date:** Friday, April 8, 2022 7:55:34 PM

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I received a card with a circle hook on it that said 13 million strippers were caught recreationally and 1 million died from improper handling. How was this data calculated since know catch reports are required recreationally. There is data on how many strippers were caught commercially but that number of how many died from improper handling is not published why. Are recreational fishermen the only ones who's fish die I don't think so I believe that number would be higher for commercial catch let all the facts be known. When the commercial quota is not met they extend the season doesn't this tell you something is wrong no just let them catch more by extending the season.

Recreational fishermen fish for fun and sport commercial fishermen fish for money with one do you think release their fish properly? If rebuilding the stock is what you are trying to do look at what they did in the lobster industry they put size limits nothing over 5 inches in cape cod bay the bigger the lobster the more eggs it has there is not a shortage of lobster in cape cod bay . Put a size limit on strippers caught commercially like nothing over 48 inches that way the big ones can survive to produce more young . Thank you for your time Richard Barbieri a recreational fishermen.

**From:** [Tim](#)  
**To:** [Comments](#)  
**Subject:** [External] Striper Fishing Amendment 7  
**Date:** Friday, April 8, 2022 7:19:09 PM

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I'm an avid sport fisherman and a member of Plum Island Surfcasters. I'm concerned about declining stocks and would like to see curtailment of the rules allowing commercial fishermen to keep fish over 35 inches.

There's significant evidence that the actual number of large fish being harvested by commercial fishermen is under reported. Rules should be tightened to remove the loopholes that allow this. All fish kept by them should be reported.

I'm pleased that circle hooks were enforced for live bait.

I crush the barbs on my lures and avoid having multiple treble hooks on a lure. I believe there is benefit in reduced injury and safer release of fish with this practice.

I'd also like to see increased funding for environmental police to catch and prosecute the poachers taking fish illegally.

Thanks  
Tim Higgins  
284 Water St  
Newburyport, MA 01950  
978-382-8900

Sent from my iPad

**From:** [cbjsks](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Recovery Proposals  
**Date:** Friday, April 8, 2022 6:45:42 PM

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Emilie Franke

I read through the articles for Draft Amendment 7. I am thinking that this process could have been a lot simpler than the lawyer jargon that I struggled through. What it comes down to is maintaining the abundance levels of the striped bass. As in other species that have had action taken to keep the species alive, like abalone here on the west coast, an immediate and straight forward proposal needs to be submitted for approval. The Stripers Forever group has some well thought out input that should be looked at. What is essential is the speed at which a solution can be put into place. I understand this issue has dragged out for a generally unacceptable length of time.

Yours. James Sponagle



**From:** [andy aiello](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment 7  
**Date:** Friday, April 8, 2022 4:50:15 PM

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Hi! My Name is Andy Aiello. I just wanted to voice my concerns over the striped bass fishery and the over fishing pressures on them. Over the years fishing mostly Southern Massachusetts waters. There has been no doubt decreasing numbers of striped bass around. I am in support of any restrictions to or management to help preserve a healthy fishery and population growth. I'm dont haveA great solution but efforts must be put forth to help the species. I would even go so far as catch and release only or make it a game fish even but whatever measures we can Dow I'll help! I hope this helps towards moves to help the dwindling population of one of our most important species!

Sent from my iPhone

**From:** [Deborah Valentine](#)  
**To:** [Comments](#)  
**Cc:** [Gary Valentine](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 8, 2022 4:48:57 PM

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I would like to comment on stripped bass regulations. I fish Jessups neck in Noyac Bay Ny as well as Orient point. I think enforcement of strict regulations is vital to the fishing industry. This is important for recreational & commercial fishermen.

I follow all rules and only keep dinner, never more. I don't specifically target stripers but I haven't kept one in 10 years, there are other fish to eat.

Watching other anglers I often see people keeping shorts or more fish than quotas allow(not usually bass). I can only imagine what happens on the open sea where commercial boats are not policed.

I trust the scientists will establish the correct #'s but without enforcement, rules mean nothing, Thank you for your effort and giving us a platform.

Gary J Valentine  
Gdval2@gmail.com  
Sag Harbor, NY  
Sent from my iPad

**From:** [Jay harrison](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Friday, April 8, 2022 4:41:39 PM

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To the ASMFC

My name is Jay Harrison from Massachusetts and I am responding to the request for public comments on Amendment Seven for the management of striped bass.

Here are my choices for each proposed regulation.

4.1

Tier 1

A1

B1

C1

Tier 2

A2

B1

C1

Tier 3

A2

B2

Tier 4

A

4.2

B- None

C1, C2

D2

4.4.1

B

4.4.2

B

4.6.2

B1-a

C3

D2

E2

A healthy population of striped bass is incredibly important for the state and is one of the greatest assets of the Cape Cod area. There are tons of businesses (tackle, charter, commercial) which depend directly on a healthy population. I think it is of the utmost importance to keep in mind the long term impacts of our actions in that we must act quickly now to ensure we can enjoy these fish into the future, otherwise the negative impact to these businesses will be slightly delayed but more dire and at this point unavoidable either way as it's already happening to an extent.

I have very fond memories of being taught how to fish by my grandfather when I was a child and I really hope I am able to do the same with my grandchildren, which is something I am worried about with the current state of the fishery. I feel we have seen this type of population decline before and we have also seen how effective a moratorium can be given how well the species rebounded.

Please stand up for the striped bass, and end overfishing as quickly as possible.  
Please manage stripers for abundance, and not yield!

Thank you for your time to read my comment and for protecting our waters!

Best,  
Jay Harrison

**From:** [Capt. Carle Hildreth](#)  
**To:** [Comments; stripercomments@gmail.com](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 8, 2022 4:37:50 PM

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Dear Members of the Striped Bass Management Board,

My name is Carle Hildreth and I am writing to submit my comments as well as my position on each of the 4 options on the draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass.

I have been recreationally fishing for Atlantic Striped Bass for over 20 years. For the last 11 summers I have guided for striped bass as a full time job here in Southern Maine. Guiding for this magnificent fish has supported my family and provided thousands of memorable experiences for my clients. I believe striped bass are a gamefish and I operate my guide business exclusively as a catch and release sportfishing experience. Each summer hundreds of clients return to Portland, Maine for the sole purpose of fishing for striped bass with me. They come from all over the country and return because they love the experience of catching these fish with me by boat and from shore. They embrace catch and release because they respect the striped bass as a gamefish and want their children to experience the same thrill of landing and releasing a striped bass some day. In fact I have several clients who now bring their youngsters out and teach them how to properly handle and revive a striped bass for a successful release. The economic impact my clients have on my little neck of the woods is significant when you consider their travel, lodging, food and other expenses incurred just for their striper fishing trip to Maine. With regards to the current state of the fishery I can say with certainty the numbers and size of the striped bass in my waters is dwindling. Seeing the fishery nosedive because of what I and many others in my industry see as a history of management failure is unacceptable. We need to take action now before it's too late. Too much is at stake to kick the can down the road. Please listen to all the guides, recreational anglers, local tackle shops and thousands of other hard working folks that depend on a healthy recreational striped bass fishery. We need an abundance of striped bass to survive and thrive. Managing the stock to the edge of the cliff of unsustainability is not acceptable. We need you to correct the course and take action to save our stripers now!

Please consider my position on each of the 4 options on Draft Amendment 7:

#### 4.1 Management Triggers

Tier 1: Fishing Mortality (F) Triggers

Option A: Timeline to Reduce F to the Target

**I support Sub-option A1** (status quo): Reduce F to a level that is at or below the target within one year.

Option B: F Threshold Triggers

**I support Sub-option B1** (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

## Option C: F Target Triggers

**I support Sub-option C1** (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

## Tier 2: Spawning Stock Biomass (SSB) Triggers

### Option A: Deadline to Implement a Rebuilding Plan

**I support Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

### Option B: SSB Threshold Trigger

**I support Sub-option B1** (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

### Option C: SSB Target Trigger

**I support Sub-option C1** (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

## Tier 3: Recruitment Triggers

### Option A: Recruitment Trigger Definition

**I support Sub-option A2:** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

### Option B: Management Response to Recruitment Trigger

**I support Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

## Tier 4: Deferred Management Action

**I support Option A** (status quo): No Deferred Management Action.

If any (or all) of the management triggers are tripped following a benchmark stock assessment

or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

#### 4.2.2 Measures to Address Recreational Release Mortality

##### Option C. Additional Gear Restrictions

**I support Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**I support Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

##### Option D. Outreach and Education

**I support Sub-option D2:** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

#### 4.4 Rebuilding Plan

##### 4.4.1 Recruitment Assumption for Rebuilding Calculation

**I support Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

##### 4.4.2 Rebuilding Plan Framework

**I support Option B:** 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 recruitment assumption specified in Amendment 7) 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.

#### 4.6.2 Management Program Equivalency (Conservation Equivalency)

##### Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status

**I support Sub-option B1-a:** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

##### Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals

**I support Sub-option C3:** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE)

exceeding 30%.

Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries

**I support Sub-option D2:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries

**I support Sub-option E2:** the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Thank you for your time in listening to my comments and positions. I understand this process is complicated, time consuming and requires you to listen to many points of view. I can only ask that you consider my feedback as equally as anyone else invested in the success of this species.

Regards,

Capt. Carle Hildreth

Master Registered Maine Tidewater Guide

No Slack! Striper Fishing Charters

Portland, ME

207-450-9428



**From:** [Jacob Jaskiel](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Friday, April 8, 2022 4:32:46 PM

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To whom it may concern,

My name is Jacob Jaskiel from Massachusetts and I am responding to the request for public comment on Draft Amendment 7 for the management of striped bass on the Atlantic coast. I am a passionate recreational angler as well as a PhD Student at Boston University studying tropical tuna fisheries. My life revolves around fish, and it troubles me to see the current state of the striped bass stock on the Atlantic coast due to conservation practices that are set up to be intentionally sluggish and unable to adapt to the rapidly changing needs of both the resource and the resource users. We are entering a time where more and more people are engaging in the fishery than ever before while the resource itself is experiencing pressures from numerous outside influences, both environmental and anthropogenic. Based on what we know about the current spawning stock biomass, fishing mortality, and the age structure of this population, I think it's time the ASMFC begins to manage this stock under what ecologists call the Precautionary Principle. Too often, fisheries are managed to optimize maximum sustainable yield, but these harvest levels are based on estimates, and while the science is the best information we have to work off of, it is often fraught with assumptions and uncertainties which provide the opportunity for overfishing to occur - much like what we're seeing now. I implore the ASMFC to take on a new approach, one that incorporates the Precautionary Principle such that we manage the fishery for **abundance** and a healthy spawning stock of large adult female fish, rather than in a manner that keeps commercial catches stable at the cost of the sustainability of the resource.

To me, the best way forward is **gamefish status** for this species. Striped bass are worth so much more alive than they are dead, and states like Florida have lead by example in showing how gamefish status, in conjunction with regulations on the handling and treatment of fish by recreational anglers and charter captains, can create a thriving fishery that supports a massive economy centered around tourism and educated recreational angling.

Below are my preferences for measures included in Draft Amendment 7:

#### **4.1**

##### *Tier 1*

A1

B1

C1

##### *Tier 2*

A2

B1

C1

##### *Tier 3*

A2

B2

##### *Tier 4*

A

#### **4.2**

B- None  
C1, C2  
D2  
4.4.1  
B  
4.4.2  
B  
4.6.2  
B1-a  
C3  
D2  
E2

To elaborate further:

#### **4.1 – Management Triggers**

I am in favor of reducing any delays in action to reduce overfishing when it's occurring. Currently, it appears the board will not even act in certain scenarios in which management thresholds have been triggered, and that is unacceptable. Once we have determined that overfishing is occurring and the stock is overfished, there needs to be **swift and decisive** measures put in place immediately to return populations to a state of not being overfished, and with no overfishing occurring.

##### *Tier 1: Fishing Mortality (F) Triggers*

I am in favor of Option A, sub-option A1 that keeps the status quo on these management triggers. The other option that delays the time for the board to act is counter to the charge of the board. It should act swiftly to correct overfishing and overfished stocks, not delay any meaningful management changes once a trigger has been activated and potentially allow overfishing of an already-overfished stock to continue.

I am in favor of sub-option B1 that keeps the status quo and requires the striped bass management program to be adjusted in order to reduce F to a level that is at or below the target within the timeframe selected under option A. Much like option A, it makes little sense to postpone the amount of time until the board adjusts its management program when overfishing is occurring.

I am in favor of sub-option C1 that retains the status quo if F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

##### *Tier 2: SSB Triggers*

I support sub-option A2 for the two-year deadline to implement a rebuilding plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. This is in line with the requirements for fish managed by the councils that operate under the Magnuson-Stevens Act. Striped bass are a coastal fish, transcending state lines, and consistency in regulations allows for a fair management plan that is more in line with how federal fisheries management operates. Striped bass have been deemed overfished since 2018, and there has been NO rebuilding plan that has been

established. This sub-option moves us towards a future where this will no longer be the case.

I support sub-option B1 that states if female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years]. If the stock is being overfished, we should act as swiftly as possible to make corrective measures, not wait more time to be “certain” that we’ve been overfishing the SSB for 10 years.

I support sub-option C1 that states if female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years]. Fishing mortality is the most direct way in which we can reduce overfishing of the stock. The Board must act as quickly as possible to reduce fishing mortality when overfishing of female SSB is occurring.

#### *Tier 3: Recruitment Triggers*

I support sub-option A2 that states the recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA) shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years. HOWEVER, this trigger needs to be re-looked at because it was never tripped for the coastal stock despite continuous poor recruitment. Functionally, this trigger means little in practice when this proposed sub-option would have been triggered three times since 2003. Sub-option A3 is perhaps too sensitive.

I support sub-option B2 that states if the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year. If recruitment is low, the Board must enact changes to adjust F to be lower in order to retain higher SSB and reduce F in anticipation of poorer year classes down the road.

#### *Tier 4: Deferred Management Action*

I support option A for no deferred management action. The Board needs to respond immediately once triggers are tripped.

### **4.2.2 - Measures to Address Recreational Release Mortality**

I do not support any measure for option B. There are already spawning closures in place and the presented measures are unclear. However, I think there should be closed seasons in major spawning and staging areas such as the Raritan Bay fishery because of the trophy hunting charters that target large prespawn females. It is imperative we reduce stressors to prespawn fish.

I support sub-option C1 that states recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

I also support sub-option C2 that states striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury. Both C1 and C2 work to reduce recreational fishing mortality. It also prevents bycatch of stripers on non-approved gear to be retained, which is currently a loop hole in management.

I support sub-option D2, which states it is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1. However, this shouldn't come at the expense of other priorities for state management agencies (e.g. funding for other priorities like enforcement being diverted to education initiatives).

## **4.4 - Rebuilding Plan**

### **4.4.1 - Recruitment Assumption for Rebuilding Calculation**

I support option B that states: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis. We should rebuild the stock under the assumption of low recruitment, since recent recruitment has been low and it's been proven through the decisions surrounding the 2011 class that one year class of fish cannot save the population that's in freefall.

### **4.4.2 - Rebuilding Plan Framework**

I support option B: 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 recruitment assumption specified in Amendment 7) 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. The update to the stock assessment may dramatically change the lens through which we view this fishery. If the assessment is not good, more drastic measures may need to be implemented to correct the overfishing and low female SSB.

### **4.6.2 - Management Program Equivalency**

I support sub-option B1-a: CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level. CE is a luxury that should only be afforded to a healthy and well-managed resource. Striped bass in their current state does not meet this standard. Until the stock is healthy, there should be no CE which will only add additional risk to management and allow more harvest.

I support sub-option C3: CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%. This is in line with current NOAA Fisheries standards. This will reduce risk within the fishery and improve access to recreational fishing data.

I support sub-option D2: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%. CE breeds uncertainty, and this will help to reduce some of the potential for harmful practices due to CE.

I support sub-option E2: the percent reduction/liberalization projected for the FMP standard at the state-specific level. There shouldn't be any states that can use E1 to effectively take no reduction in their catch. Why would New Jersey be allowed to kill more fish than everyone else? It's not about pounds of fish in the boat, it's about the longevity of the resource. Fish abundance over commercial interest, **always**.

With respect and thanks,

Jacob Jaskiel

**From:** [Bill Wedge](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass - Amendment 7  
**Date:** Friday, April 8, 2022 3:39:41 PM

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It was suggested I send comments. I am an avid fisherman and live 5 months of the year in West Falmouth MA. I commercial fished stripers on and off w/ my son for about 10 years from about 2006 – 2016. I have recreationally fished stripers all over the Cape for about 20 years.

My observations:

1. Every year I commercially fished w/ my son, we had to find a new spot. It used to be the rip of Gay Head and along the Elizabethan islands. Then it was in various spots in Nantucket Sound. Then off Chatham. Then in Cape Cod Bay off Scorton and P town harbor. And the last five years at the W end of the canal. It seemed like each year we had to find a new spot b/c the previous years spot was fished out. Last year, there were no fish at the W end of the canal.
2. In fact, last year was the worse year for Stripers that I can remember in the last 20 years.
3. No doubt over fishing.
4. We never take more fish than allowed. And 90% of the time only take one slot sized fish – about 32”.
5. I was told that all the big ones are females. So we never take a big one – 36” plus unless it will not survive.
6. Unfortunately, a lot of big ones are so gassed when you get them in that they don’t seem like they will survive. But we do our best to resuscitate them and give them the best chance possible. Minimize the time they are out of the water and wade them till they seemed revived.
7. Not all people do this and many are not considerate of the fish or fishery.

I definitely think the rules need to be changed and enforced to bring back Stripers and protect them.

I am a lawyer and very interested in this stuff.

Your 130 page explanation is amazingly thorough and the video is very informative. I will read the 130 pages when I have a chance. I know a lot of fisherman and I don’t know anyone other than me that will read it.

You need to condense it and provide a 3 page executive summary for 99% of fisherman and interested parties.

You need a shorter video also.

I am glad to help. Please let me know.

Thank you for all your work. It is amazing. But you need to remember your audience. There are few

scientists or ichthyologists among the fishing population. That is a fact.

You need to keep it simple.

Bill Wedge

Please keep us in mind for all of your Tax-Financial-Real Estate- R/E Closings-Equestrian Legal Matters.



**William J. Wedge, Esq.**  
J.D., LL.M. in Taxation  
*Principal*

**Wedge Associates LLC**

12180 South Shore Blvd. Ste. 101A | Wellington, FL 33414  
Office: [561-515-5514](tel:561-515-5514) | Mobile: [561-324-3455](tel:561-324-3455)  
[E-Mail](#) | [V-Card](#) | [Website](#)

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From: [steven foceri](#)  
To: [Comments](#)  
Subject: [External] 'Draft Amendment 7'  
Date: Friday, April 8, 2022 3:38:55 PM

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Dear Emilie Franke, FMP Coordinator;

As an avid guide and sportsman who makes a living from the waters of NY I am submitting this email in hopes of making an impact and saving the species that I rely so much on. I will make this very brief as I am sure you will receive a lot of these, many of which probably can and will be verbatim of mine

Tier 1: Fishing Mortality Triggers Sub Option A1	Recruitment Trigger: Sub Option A2
Threshold Triggers: Sub Option B1	Management Responses to Recruitment Trigger: Sub Option B2
Target Triggers: Sub Option C1	Tier 4: Deferred Management Action Option A – NO DEFFERMENT!
Tier 2:SSB Triggers Sub Option A2	Recreational Release Mortality: Sub Option B2 – Seasonal Closures Sub Option C1 Sub Option C2
SSB Threshold Trigger: Sub Option B1	Outreach and Education: Sub Option D2
SSB Target Trigger: Sub Option C1	Recruitment Assumption for Rebuilding Calculation: Option B
Rebuilding Plan Framework: Option B	
Management Plan Equivalency: Sub Option B1-A Sub Option C3 Sub Option D2 Sub Option E2 <!--[if !supportLineBreakNewLine]--> <!--[endif]-->	<!--[if !supportLineBreakNewLine]--> <!--[endif]-->

Thank you very much. Now we'll wait for the 2022 Striped Bass Stock Assessment and make changes again.



Very truly,

*Steven Foceri*

Steven Foceri

**From:** [Stephen Madden](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [2022stripercomments@gmail.com](mailto:2022stripercomments@gmail.com)  
**Subject:** [External] "Amendment 7" My Comments  
**Date:** Friday, April 8, 2022 3:17:41 PM

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Subject line: Striped Bass Amendment 7 comments

To the ASMFC

My name is Stephen E. Madden from the State of Massachusetts and I am responding to the request for public comments on Amendment Seven (7) for the management of striped bass.

Here are my best choices for each proposed regulation.

4.1

Tier 1

A1

B1

C1

Tier 2

A2

B1

C1

Tier 3

A2

B2

Tier 4

A

4.2

B- None

C1, C2

D2

4.4.1

B

4.4.2

B

4.6.2

B1-a

C3

D2

E2

\*\*\*\*\* My personal comments:

I would be reiterated to state I believe the Striped Bass should be considered a Catch and Release only species for sport fishing only.

I would also like to reinforce the importance of Angler Education for the continued safe release of Striped Bass.

Please stand up for the striped bass, and end overfishing as quickly as possible.

Please manage our stripers for abundance, and not yield!

Thank you,

Stephen E. Madden

RECREATIONAL ANGLER

[Sent from Yahoo Mail on Android](#)

**From:** [Martin Barth](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 8, 2022 3:14:04 PM

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Dear Ms. Franke

In regards to Atlantic States Marine Fisheries Commission Draft Amendment 7:

Below are my opinions to **TIER 1 OPTIONS: Fishing Mortality (F) Management Triggers:**

- Option A – select sub-option A2
- Option B – select sub-option B2
- Option C – select sub-option C2

Below are my opinions to **TIER 2 OPTIONS: Female Spawning Stock Biomass (SSB) Management Triggers**

- Option A – select sub-option A2
- Option B – select sub-option B1
- Option C – select sub-option C2

Below are my opinions to **TIER 3 OPTIONS: Recruitment Triggers**

- Option A – select sub-option A2
- Option B – select sub-option B1

Below are my opinions to **TIER 4 OPTIONS: Deferred Management Action**

- Select Option B

#### **4.2 RECREATIONAL FISHERY MANAGEMENT MEASURES**

**Option A** – circle hooks should be required

**Option B** – Keep the current season in place and only implement harvest closures only (if necessary) for the following reasons (from the perspective of a Hudson River fisherman):

The season is only 4 weeks in the upper Hudson and this would severely limit the fishing there resulting in the following:

- Economic impacts to the local businesses, many charter captains would not be able to put their boats in the water at all resulting in trickle down affects to other businesses that support this industry.
- Takes an opportunity away to get people outdoors in particular kids
- A “No Target Closure” promotes poaching (as the Hudson River is season is so short people will poach. If they are already breaking the law to fish during a closed season they will also keep the fish they catch instead of catch and release).

**Option C. Additional Gear Restrictions**

- Select sub-options C1 and C2

**Option D. Outreach and Education**

- Select sub-option D1

I will not reply to the further options in specific, but here are my general opinions on those issues:

- Striped bass should be a game fish for recreational fishing only
- A commercial fishery is not necessary as striped bass can be farm raised as a hybrid version

which can satisfy the commercial market.

- The current slot limits seem to be affective
- I don't agree with conservation equivalency. The Hudson River stock is in fairly good shape from my experience and the state of the Chesapeake bay and other stocks shouldn't affect the way the Hudson River stock is handled.

All states need better enforcement if necessary permit fees should be introduced in states that don't have them. A purchased marine permit should be valid for all east coast states. Consider selling tags for harvesting striped bass.

Sincerely,

Martin Barth  
Ulster Park, NY

**From:** [Darryl Meattey](#)  
**To:** [Comments](#)  
**Subject:** [External] Strippers  
**Date:** Friday, April 8, 2022 2:13:06 PM

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Close commercial fishing , you are going to kill the good fishing we have had .  
Most of us catch and release !

“Celebrating 40 years in business”

Darryl Meattey  
President and CEO | Surell Accessories  
Phone: (603) 242-7784  
[www.shopsurell.com](http://www.shopsurell.com)  
[www.facebook.com/surellaccessories](http://www.facebook.com/surellaccessories)  
[@shopsurell](#)

**From:** [Scott Surprise](#)  
**To:** [Comments](#)  
**Cc:** [scottsurprise4377@gmail.com](mailto:scottsurprise4377@gmail.com)  
**Subject:** [External] Bass  
**Date:** Friday, April 8, 2022 1:37:29 PM

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Please protect the species and the species they forage on  
Thank you  
Scott Surprise

Sent from my iPhone

From: [Scot Calitri](#)  
To: [Comments](#)  
Subject: [External] Amendment 7  
Date: Friday, April 8, 2022 1:30:38 PM

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As one that has spent about 45 years sport fishing and several years in the commercial fishing industry, I am severely concerned for the future of our waters and specifically our native Striped Bass. I feel and remember the disappearance in the late 70s / early 80s, misbalanced populations and year classes as well as changes in forage, predation and human behavior.

in 2018 the ASMFC declared that "**Striped bass are overfished and overfishing is occurring**" this needs to be rectified and contrary to some opinions, we all need to take some responsibility.

For once we need to manage this species for abundance and future survival. Maximum sustainable yield has only proven to be a losing bet and risks increase with the climate changes, misbalanced predation and pollution risks we're experiencing, **This takes a new approach. You have this responsibility for us, but we need you to take a new approach.**

We also need to remind ourselves and others that a living fish has much more value than a dead fish. Additional opportunities for spawning, preserving particular gene pools and possibly providing multiple sport fishing opportunities outweigh the couple of \$\$ per pound of a dead commercial fish. I still have not met, heard of or read about anyone making their living from commercial striped bass harvest.

Don't let this be another tragedy of the commons. We and the fish are counting on you.

- Scot Calitri  
Durham, NH

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Specifics for those gathering statistics. I support aggressive mitigation that includes:

#### **4.1 Management Triggers**

Tier 1

- Sub-Option A1
- Sub-Option B1
- Sub-Option C1

Tier 2

- Sub-Option A2
- Sub-Option B1
- Sub-Option C1

Tier 3

- Sub-Option A2
- Sub-Option B2

Tier 4

- Option A

#### **4.2.2 Measures to Address Recreational Release Mortality**

Option C



- Sub-Option C1
- Sub Option C2
- Option D
- Sub Option D2

#### **4.4 Rebuilding Plan**

##### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

Option B

##### **4.4.2 Rebuilding Plan Framework**

Option B

##### **4.6.2 Management Program Equivalency**

Option B

- Sub-Option B1-a

Option C

- Sub-Option C3

Option D

- Sub-Option D2

Option E

- Sub-Option E2

**From:** [Michael Iven](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 8, 2022 1:28:43 PM

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To whom it may concern:

Just writing to let you know my thoughts on amendment 7. Small backstory: I moved to the cape in 2002. I was enamored with the fact I could saltwater fish every day, as where I lived I would only have access two weeks a year on vacation.

I remember catching my first striper, and it was a keeper! I let the fish swim away, and fishing back then was GOOD most of the season sans deep summer months which push them offshore a little more. 2014 I got my commercial license. My first year was great! A few eggheads but nothing too horrible. The fishing was a incredibly slow by 2017, The stripers and blues just weren't there. I blamed it on cyclical cycles.

It's now 2022. And I've seen and heard some horrible things. There are far fewer fish than I've ever seen. Behaviors on the boat and from shore that are inexcusable. Over the radio there are a few bad apple commercial guys poaching, swinging gaffs at you because you're on "their rip" or don't like your drift pattern; being disgusting down at the Canal with behaviors such as hiding fish several illegal sized poached fish in the woods, defecating right off the trail near fish they intend to sell, illegal commercial fishing, poaching from herring runs, and grown men yelling at children and grandparents at the east end bulkhead for "poaching small tautog" because they can't identify a cunner when they see it. All they were doing was jigging a sabiki. I approached the man and he said he was "protecting his livelihood".

As a fisherman, I just want the stocks to be like they were. All of our children deserve that rush when you feel that drag screaming for the first time.

Regards,  
Zac the fledgling fishing guy.

**From:** [Potvin, Brian \[MCCUS\]](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 8, 2022 12:48:11 PM

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Hello, I'm writing you to share my sentiments regarding amendment 7 and striped bass conservation in general. I am an avid catch-and-release fly fisherman and have been fishing from Maine down to Rhode Island regularly and frequently for the last 20 years. I keep good records of my activity and catches. I, like many others, have seen a dramatic decline in the numbers of fish caught. My best season I caught more than 600 stripers and this past season I struggled to catch 75 while trying harder, even though you'd think I'd be getting better at this kind of thing. The summer of 2021, we had a strange push a very large fish come up through the Cape Cod canal who's average size was close to 40 inches, but that week long anomaly was a strange outlier as well. So, things have been strange and steadily declining.

I would strongly encourage that we take as drastic a means of protection as we can manage. I know that this stock is resilient, we need to give it a chance to recover and survive. If this means putting a full moratorium on it for a few years, I am fully supportive. I think the way we manage it now on a state by state basis is flawed. Selfish interests prevail and don't give consideration to the entirety of the stripers' migration range. I would personally like to see us manage this fishery on a national basis rather than state by state, but in the absence of that, I would encourage much greater cooperation and partnership that I've seen over the years to salvage and sustain this important resource.

Brian Potvin | 978.778.0586  
83 Green Street, Marblehead MA 01945

**From:** [Norcalkat](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 8, 2022 12:39:47 PM

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Thank you for taking the time to read this, my name is Orlando Campos. I am a West Coast fisherman out of the San Francisco Bay area. We have East Coast Striped Bass that were transported via train from New Jersey's Navesink River in the 1880s, they have been here since, and I am very thankful because of this. I am a very passionate striped bass fisherman, that travels 2-3 times a year to the East Coast from the Tip of Montauk down to the Cape of Massachusetts into Martha's Vineyard. 10 to 12 days of strictly fishing, enjoying the scenery, the travels and meeting multiple like minded anglers.

I would like to see we go away with conservation equivalency. What needs to be put in place is coast-wide regulations so the true slot limit can work. If you allow each state to have their own regulations, they will abuse the loopholes and the effort to protect the biomass is null point if there is no repercussions to doing so. They are using conservation equivalency to gain from the system and get around the reduction. At bare minimum we should not use these modified regulations when the stock is overfished. Hold them accountable if they over fish and have them pay for the poundage overage the next year.

Thank You for your time,  
Orlando Campos

**From:** [Peter Farrell](#)  
**To:** [Comments](#)  
**Subject:** [External] amendment 7  
**Date:** Friday, April 8, 2022 12:26:53 PM

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to asmfc,

please consider the future of striped bass in the northeast. in places where we once had remarkable night bites of stripers there are none. the population has crashed and all factions of the fishery must join together to bring the stocks back and to MAINTAIN. for the future, not allowing commercial and six pack charter fleets from decimating the stocks yet again. we all want the joy again of just going down to the beach and catching some bass.

thanks,

capt. pete farrell

Sent from my iPhone

**From:** [Jeff C. Sobejana](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 8, 2022 12:18:37 PM

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To whom it may concern,

My name is Jeff Sobejana and I am a surfcaster from Shelter Island, NY. I have am a new surfcaster and been in the sport for about 6 years now. I have to admit that on my first year, I have no knowledge of our Striped bass situation. After meeting and knowing so many wonderful people on conservationists in the sport, I have grown a desire to save our fishery here for my children and their children sake.

These are the options I support:

#### 4.1 Manangement Triggers

Tier 1:

Option A - Support A1

Option B - Support B1

Option C - Support C1

Tier 2:

Option A - Support A2

Option B - Support B1

Option C - Support C1

Tier 3:

Option A - Support A3

Option B - Support B2

Tier 4:

Support A

#### 4.2 Measures to Address Recreational Release Mortality

Option B - Support B2

Option C - Support C1, C2

Option D - Support D2

#### 4.4.1 Recruitment Assumption for Rebuilding Calculation

Support Option B

#### 4.4.2

Support Option B

#### 4.6.2

Option B - Support B1-a

Option C - Support C3

Option D - Support D3

Option E - Support E2

Thank you fo you good office,  
Jeff S.

**From:** [Andrew Sinchuk](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 8, 2022 11:59:30 AM

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First things first here are all the options i support:

Tier 1: Fishing Mortality (F) triggers

Option A: Timeline to Reduce F to the Target

I Support Sub-option A1 (status quo)

Option B: F Threshold Triggers

I support Sub-option B1 (status quo)

Option C: F Target Triggers

I support Sub-option C1 (status quo)

Tier 2: SSB Triggers

Option A: Deadline to Implement a Rebuilding Plan

I support Sub-option A2

Option B: SSB Threshold Trigger

I support Sub-option B1 (status quo)

Option C: SSB Target Trigger

I support Sub-option C1 (status quo)

Tier 3: Recruitment Triggers

Option A: Recruitment Trigger Definition

I support Sub-option A2

Option B: Management Response to Recruitment Trigger

I support Sub-option B2.

Tier 4: Deferred Management Action

I support Option A (status quo)

4.2.2 Measures to Address Recreational Release Mortality

I support sub option C1, and C2

Option D. Outreach and Education

I support Sub-option D2

4.4 Rebuilding Plan

I will write more about this after the lunacy of going through the million options.

4.4.1 Recruitment Assumption for Rebuilding Calculation

I support Option B

4.4.2 Rebuilding Plan Framework

I support Option B:

4.6.2 Management Program Equivalency

Option B. Restrict the Use of Conservation Equivalency Based on Stock Status

I support Sub-option B1-a:

Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals

I support Sub-option C3:

Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries

I support Sub-option D2:

Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries

I support Sub-option E2

That just took me over an hour to do. That's unacceptable. How do you expect the average stakeholder to spend the time to do this? I have so many problems with what has gone on with



the ASMFC and striped bass management I don't know where to begin. Striped bass has gone from the golden child of the ASMFC to the biggest disaster/screw up fisheries management has ever seen. Time after time the ASMFC bends the knee to the states of the Chesapeake and NJ who want nothing more than to harvest more fish. Conservation equivalency for the most part is a joke. It's a shame that the majority of the stock comes from the Chesapeake because they do not care one bit about the resource. The 10 year rebuilding plan that has only a 50% chance of success is a joke. If you want 10 years to rebuild the stock then you better have a 100% chance of success. And guess what? There is no chance that we are rebuilding the stock after below average spawn years following the current stock assessment. So that 50% chance is more like 0% chance in 10 years. It's more like a 20 year rebuilding plan. I disagree with the decision to not protect the 2015s. They will suffer the same fate as the 2011s.

The truth of the matter is a majority of the stakeholders, I would say 80% just want more fish in the water. We just want to be able to go out and catch fish with our family and our children. We are willing to do what is needed to rebuild the stock. We are willing to have no target periods, shorter seasons, and whatever other sacrifices are needed to get the stocks back to the hay day of the late 90s and early 2000s. Personally I have no problem with the commercial fishery. There is one change I would like to see made and that is making it a hook and line fishery. Enough with the haul seines, gill nets and other means of fishing that leave dead discards of striped bass and the various other fish that die in those nets. Make it hook and line and have them keep anything under 40 inches. I don't care if they are keeping 23 inch bass. That's fine. It is better eating and will reduce the discard mortality.

I would like to see seasonal closures around peak spawning periods. We just did it with horseshoe crabs with no harvest around 2 major moons to allow them to spawn. Let's do the same thing with striped bass. During peak spawning periods on all spawning estuaries I would like to see no harvest at a minimum and ideally no target. Give those breeders a god damn break. We know from the diadotti study that Gut hooking is the number one cause of release mortality. We made adjustments, great. Salinity is the number 2 factor in a fish's ability to recover after release. Guess what those bass are spawning in low salinity environments meaning those fish have a higher mortality rate after being released. If we are trying to reduce discard mortality we need to start in the estuaries.

Another thing I would like to address is enforcement and the accompanying fines and penalties. First we need more enforcement, period. If that means going to a 5-10 dollar saltwater marine registry to triple the amount of officers then so be it. Most anglers would be fine with that. And those that aren't okay with it and claim they don't have the money are either lying, doing illegal activities themselves, or maybe they don't have the money. If that's the case, provide a tax return proving poor income and get a free permit, that's fine. We need more officers on the banks of the Hudson, Chesapeake, and out on the water. I live on a long island, we have 7 marine agents, that's laughable. How are they supposed to cover the entire Island. That brings me to the penalties of the guys that are caught. I know from talking to the ECO's that most cases are thrown out or the fines are minimal. How is that going to discourage an angler from illegal action again? We need hefty fines, license suspension, and gear seizure. Then onto the bigger cases of poaching especially in the commercial fishery with all of the under the table deals that go on at places like Gosmans and the Fulton fish market: again the fines are not steep enough. How is giving an action that netted the perpetrator 1.5 million dollars only a fine of 150 thousand going to stop them from doing it again. It in fact encourages them to do it again. We need a complete overhaul of enforcement and what comes after. I know that is not something the ASMFC can make happen but at least

have it talked about.

Please, members of the ASMFC, listen to the people. We want the striped bass populations back where they should be and so should you. Err on the side of conservation and recovery. Do not keep bending the knee to stakeholders just wanting more harvest. Those stakeholders are nearsighted.

I thank you for taking the time to read this letter, and all others submitted. I wish you luck in coming to a right and just decision.

Andy

**From:** [Michael Lynch](#)  
**To:** [Comments](#)  
**Cc:** [Cheri Patterson](#); [Renee Zobel](#); [RITCHIE WHITE](#); [dhw@cisunix.unh.edu](mailto:dhw@cisunix.unh.edu); [Dennis Abbott](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 8, 2022 11:51:19 AM

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Dear ASMFC leadership and NH Commissioners,

I have been a recreational fisherman for striped bass since I was 16 years-old when my father and I started fly-fishing out of Newport with a guide in 1982. We fished in Rhode Island and up to the Westport River area. I have now had the great fortune to pass along the love of fishing for this amazing fish to my two boys. And I very much hope that they will pass along this passion and understanding to their children. As I have fished over the years, I have seen the rise of this great fishery, but also the alarming declines we have seen over the last decade. I used to go out to Martha's Vineyard with my father in the late 80's and into the 90's. That fishery is not what it was at its peak either. I remember night's on dogfish bar with fish breaking around me until the sun rose. And in New Hampshire where I now live and in Maine where I grew up I have similar memories. I remember watching a sunrise at the mouth of the Kennebec with fish breaking as far as the eye could see.

There is so much to save here. This fishery has proven before that it can recover and grow and thrive. Our earth is truly imperiled in so many areas, and this is one area, one place where we can help it heal and recovery. For us, for future generations, for the ecosystem itself. We need to commit to creating a thriving fishery and abundance for everyone who loves and benefits from this fishery, for now and the future. Thank you for considering my positions outlined below.

Sincerely,

Michael Lynch, MD  
Chief Medical Officer at Alice Peck Day Memorial Hospital  
Lebanon, NH 03755

My positions:

Whether we are guides, recreational anglers, or commercial anglers, abundance benefits everyone. Thank you for noting and considering my positions below on the many items being discussed in Draft Amendment 7.

#### **4.1 Management Triggers**

Tier 1: Fishing Mortality (F) Triggers

##### **Option A: Timeline to Reduce F to the Target**

***I support Sub-option A1:*** Reduce F to a level that is at or below the target within one year.

##### **Option B: F Threshold Triggers**

***I support Sub-option B1:*** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

##### **Option C: F Target Triggers**

***I support Sub-option C1:*** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

Tier 2: Spawning Stock Biomass (SSB) Triggers

**Option A: Deadline to Implement a Rebuilding Plan**

***I support Sub-option A2:*** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

**Option B: SSB Threshold Trigger**

***I support Sub-option B1:*** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

**Option C: SSB Target Trigger**

***I support Sub-option C1:*** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

Tier 3: Recruitment Triggers

**Option A: Recruitment Trigger Definition**

***I support Sub-option A2:*** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)11 shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

**Option B: Management Response to Recruitment Trigger**

***I support Sub-option B2.*** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

Tier 4: Deferred Management Action

***I support Option A: No Deferred Management Action.***

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

**4.2.2 Measures to Address Recreational Release Mortality**

**Option C. Additional Gear Restrictions**

***I support Sub-option C1:*** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

***I support Sub-option C2:*** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

**Option D. Outreach and Education**

***I support Sub-option D2:*** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

**4.4 Rebuilding Plan**

**4.4.1 Recruitment Assumption for Rebuilding Calculation**

***I support Option B:*** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

**4.4.2 Rebuilding Plan Framework**

***I support Option B:*** 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 recruitment assumption specified in Amendment 7) 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.

#### **4.6.2 Management Program Equivalency (Conservation Equivalency)**

##### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

***I support Sub-option B1-a:*** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

##### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

***I support Sub-option C3:*** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

##### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

***I support Sub-option D2:*** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

##### **Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

***I support Sub-option E2:*** the percent reduction/liberalization projected for the FMP standard at the state-specific level.

**From:** [Michael Brangwynne](#)  
**To:** [Comments](#)  
**Subject:** [External] Comment for Amendment 7  
**Date:** Friday, April 8, 2022 11:37:31 AM

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My name is Michael Brangwynne and I am a recreational striped bass fisherman from the state of Massachusetts. I have been fishing for striped bass since before I can remember. There is something truly special about these fish. I think we need to do everything in our power to not only preserve the stock, but to manage the stock for abundance. An abundant striper population is much more important to me than the harvesting of fish. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment.

Sincerely,

Michael Brangwynne  
Watertown, Massachusetts  
Email: [mike.brangwynne@gmail.com](mailto:mike.brangwynne@gmail.com)

**From:** [bran@brandoughertyjohnson.com](mailto:bran@brandoughertyjohnson.com)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [2022stripercomments@gmail.com](mailto:2022stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 8, 2022 11:04:16 AM

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To the commission,

I am commenting on the proposed striped bass Amendment 7. My name is Bran Dougherty-Johnson and I am a surfcaster from Shelter Island, NY. I am a member of the North Fork Anglers and Montauk Surcasters Alliance. I practice catch and release as best and quickly as I can, and have not harvested a striped bass in several years.

I believe the commission should do everything possible to protect the fishery, prevent overfishing and manage the striped bass stock for abundance as quickly as possible. Conservation Equivalency SHOULD NOT be used when a stock is overfished.

I support these options:

#### **4.1 Management Triggers**

Tier 1:

Option A - Support **A1**

Option B - Support **B1**

Option C - Support **C1**

Tier 2:

Option A - Support **A2**

Option B - Support **B1**

Option C - Support **C1**

Tier 3:

Option A - Support **A3**

Option B - Support **B2**

Tier 4:

Support **A**

#### **4.2 Measures to Address Recreational Release Mortality**

Option B - Support **B2**

Option C - Support **C1, C2**

Option D - Support **D2**

#### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

Support **Option B**

#### **4.4.2**

Support **Option B**

#### **4.6.2**

Option B - Support **B1-a**

Option C - Support **C3**

Option D - Support **D3**

Option E - Support **E2**

Please act fast to protect the fishery and rebuild the stock! We want to be able to fish for striped bass in the future with our children and grandchildren.

Thanks very much for your consideration,

Bran



**From:** [John Manteiga](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft ammendment 7  
**Date:** Friday, April 8, 2022 11:00:24 AM

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Hello,

Thanks for accepting my comments.

I am a long time recreational fisherman and as such I am very concerned about the current state and future of the Striped bass fishery.

I am supportive of most proposals to rebuild the stock including no-take and a ban on commercial harvests. I would also support a requirement for all barbless hooks and a limit on the number of hook points/lure or line to reduce release mortality. Double and triple barbed hook treble hooks on a single lure are not conducive to low release mortality.

I do not support fishing closures or no fishing zones unless they are associated with protecting spawning.

Sincerely,  
John Manteiga  
242 Lacy St  
North Andover, Ma, 01845  
Sent from my iPad

**From:** [Dennis Northrup](#)  
**To:** [Comments](#)  
**Subject:** [External] Interstate Fishery Management Plan For Striped Bass  
**Date:** Friday, April 8, 2022 9:59:10 AM

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I am a long time Striper fisherman who surf casts off the coast of Maine in the summer but primarily fish the upper Hudson River during the spawning run. I keep hearing about fish mortality levels due to recreational fishing and I honestly think this number is overstated or at the very least, not accurate. I put a lot of time on the river in the Albany & Bethlehem stretch of the river. I see other fishermen at the launch and speak to many fishermen on the radio or on my cellphone and some may have a 2 or 3 fish day and many don't catch any. I talk to charter captains and shore fishermen so I think I have a pretty good idea of what is going on on the upper part of the river. I put on a striper derby for over 10 years with 120-130 entries. On a good year I would weigh in a dozen fish, maybe a few more. Other years could possibly produce only 6-7 fish. Point is, while there is a reasonable number of fishermen on the river I hear more skunked reports than success. Also, I rarely see any dead stripers floating down river so I think the mortality level from released fish is not that great, or at least not significant when using live or chunk bait w/ circle hooks.

With that said, I do have concerns about the impact of trolling stick baits down in the lower section of the river. This technique results in a lot of fish being caught, many of them being smaller, and the treble hooks tear them up. I would suggest treble hooks be banned from any form of striper fishing. I am sure this would cut down on the number of fish being released with damage to their gills.

I'd also suggest that night fishing be eliminated. I've spoken with captains who have 50+ fish nights when the tides and moons are right. This would lower the number of fish being disturbed during the season.

Lastly, try shortening up the season a little. Maybe start it the second Saturday of the month and close it around the 20th of May. This would relieve some of the pressure on the early and late season fish.

Ps. I don't want to jump on the anti-commercial fishing bandwagon but it does bother me, and it doesn't make sense, that some of the fish in the slot that recreational fishermen have to

Release are allowed to be harvested by commercial fishermen.....and of course they take them in bulk!

Dennis Northrup  
Selkirk NY 12158  
518-424-6823  
Sent from my iPhone

**From:** [Jamie Houtz](#)  
**To:** [Comments](#)  
**Subject:** [External] Stripe bass fishing  
**Date:** Friday, April 8, 2022 9:37:02 AM

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Can't say I follow all the Striped Bass conservation meetings or organizations but as a long time saltwater fly fisherman I can tell you what I see!

I fish a very populated but secluded beach/estuary outlet in southern Maine for over 25 years. The pressure from fishermen on the population of Striped Bass is extremely small and yet that population of migrating fish has continued to decline in numbers and size. The bait has not diminished but the fish are not coming into this estuary as they have in recent years. It's not up to me to tell other North Atlantic States how they fish but if the migratory Striped Bass population of NE don't have a single voice at the federal negotiating table they will continue to decline! Good luck and God Speed! Jamie Houtz

**From:** [Jerome O'Sullivan](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Friday, April 8, 2022 9:10:37 AM

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Hello, my name is Jerome O'Sullivan and I am a recreational angler in Maine. I grew up fishing for striped bass in Massachusetts in the early 2000's and have watched the striped bass fishery grow to become a healthy fishery and then fall to the sad state that it is in today. I want to express my opinion that striped bass should be managed conservatively. The worst case scenario would be an abundance of bass. Below I have included my comments on Draft Amendment 7.

In regards to management triggers, I support requiring the Striped Bass Board to implement a rebuilding plan within two years of an overfished designation. I also believe we should change the recruitment trigger so that it actually trips when the coastal stock experiences poor recruitment, and that the Board needs to be compelled to react to periods of low recruitment by reducing mortality.

In regards to recreational release mortality, I support sub-option C1 and C2. Gaffs should not be allowed. I also support a temporary closure on targeting striped bass during spawning, but am worried that enforcing this would be difficult since anglers can claim striped bass as a by catch. Regardless, striped bass should not be harvested before or during their spawning period. I also support sub-option D2 and believe that education can help reduce mortality.

In regards to CE, I believe that the use of conservation equivalency should not be allowed if the stock is overfished. I support requiring minimum state recreational data standards and employing an uncertainty buffer.

For the rebuilding plan, I support the two-year deadline to implement a rebuilding plan. I want to again stress my belief that we should be managing striped bass as conservatively as possible and a rebuilding plan should err on the side of doing too much instead of too little. I believe the Striped Bass Board can rebuild the species by 2029 by acting quickly this fall if the new

stock assessment shows that our striped bass population is in as much trouble as we all think it is.

I believe that the striped bass fishery is one of the greatest in the world. A wild fish that is accessible to so many people of all different socioeconomic backgrounds from Maryland to Maine is truly remarkable during this time where we are watching wild species disappear everywhere. I urge the Striped Bass Board to act urgently and conservatively moving forward.

Thank you,

Jerome O'Sullivan

From: [Ryan Kim](#)  
To: [Comments](#)  
Subject: [External] Draft Amendment 7  
Date: Friday, April 8, 2022 7:17:57 AM

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Dear ASMFC,

I currently live in Massachusetts but was born and raised in Maryland where I grew up fishing in the Chesapeake Bay and ocean beaches of Maryland, Virginia and Delaware. I am a father of two teenagers and the owner of several businesses in manufacturing, retail and restaurants that operate from MA down to FL. I have been fishing for Striped bass as a recreational angler for over 40 years, most recently in Boston Harbor where I kept a boat from 2002 to 2008, and from our summer home near Buzzards Bay. I fish on paddleboard, on foot and from a boat, releasing everything except a bluefish or 28" striper every few years as a treat for our family.

I am 48 years old, so I remember the dark years of the near-extinction of Striped Bass, and have incredible respect for the courageous actions taken to save the species through responsible and data-driven leadership. The health of the striped bass fishery is of incredible importance to me, as I want my kids to have the same memorable experiences that I had as a kid, as my father did in his time. I support many local fishing guides with my business, and my town and state tax base and local boat yards as the owner of two boats. All of this revenue for our economy depends on a healthy and abundant fishery.

I am very concerned by the dwindling spawning year classes over the past decade and the absence of diversity in Striped Bass caught in our waters. Please take immediate action as a leader of the ASMFC to manage our Striped Bass population back to where it should be. Thank you for noting and considering my positions below on the many items being discussed in Draft Amendment 7.

Sincerely,

Ryan Kim

45 Bishopsgate Road

Newton MA 02459

617-650-6236

## 4.1 Management Triggers

### Tier 1: Fishing Mortality (F) Triggers

#### **Option A: Timeline to Reduce F to the Target**

*I support Sub-option A1:* Reduce F to a level that is at or below the target within one year.

#### **Option B: F Threshold Triggers**

*I support Sub-option B1:* If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

#### **Option C: F Target Triggers**

*I support Sub-option C1:* If F exceeds the F target for two consecutive years and

female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

## Tier 2: Spawning Stock Biomass (SSB) Triggers

### **Option A: Deadline to Implement a Rebuilding Plan**

***I support Sub-option A2:*** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

### **Option B: SSB Threshold Trigger**

***I support Sub-option B1:*** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

### **Option C: SSB Target Trigger**

***I support Sub-option C1:*** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

## Tier 3: Recruitment Triggers

### **Option A: Recruitment Trigger Definition**

***I support Sub-option A2:*** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

### **Option B: Management Response to Recruitment Trigger**

***I support Sub-option B2.*** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

## Tier 4: Deferred Management Action

### ***I support Option A: No Deferred Management Action.***

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

## 4.2.2 Measures to Address Recreational Release

### **Mortality**

#### **Option C. Additional Gear Restrictions**

***I support Sub-option C1:*** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

***I support Sub-option C2:*** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

## **Option D. Outreach and Education**

***I support Sub-option D2:*** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

## **4.4 Rebuilding Plan**

### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

***I support Option B:*** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

### **4.4.2 Rebuilding Plan Framework**

***I support Option B:*** 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 recruitment assumption specified in Amendment 7) 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.

## **4.6.2 Management Program Equivalency (Conservation Equivalency)**

### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

***I support Sub-option B1-a:*** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

***I support Sub-option C3:*** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

***I support Sub-option D2:*** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

### **Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

***I support Sub-option E2:*** the percent reduction/liberalization projected for the FMP standard at the state-specific level.

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<https://www.castleislandpartners.com/>  
<https://www.linkedin.com/in/ryankim2/>

**From:** [Frank Huza](#)  
**To:** [Comments](#)  
**Subject:** [External] KAF Comments on Draft Amendment 7  
**Date:** Thursday, April 7, 2022 7:50:15 PM

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Dear Ms. Franke,

As a striped bass angler, I support balancing precautionary management with regulatory stability and reasonable access to the fishery. Toward that end I recommend a Closed Fishery from December 31 of each year until June 1 of the following to allow all females to spawn. Keep it simple, more fish will make a better Summer / Fall Fishery.

Sincerely,

Frank Huza  
43 Beacon Ln  
Matawan, NJ 07747  
fjhuza@gmail.com

From: [Dante Ursini](#)  
To: [Comments](#)  
Subject: [External] Draft Amendment 7-Save the Stripers!  
Date: Thursday, April 7, 2022 7:19:32 PM

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Dear ASMFC,

I am a recreational angler from Higganum, CT and I cherish my time striped bass fishing out of the Connecticut River with my Dad and grandfather. I am concerned about the decrease in striped bass and want to see more conservative management to protect the fishing we love. Regarding proposals in the Draft Amendment 7, I wish to see the following options adopted:

On 4.1 Management Triggers, I support:

- Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality
- Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold
- Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions
- Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, I support:

- Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method
- Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, I support:

- Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. I recognize this option may require more restrictive management measures than option A, which I support

On 4.4.2 Rebuilding Plan Framework, I support:

- Option B to allow the Board to take direct management actions as III as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, “Management program equivalency (also known as “conservation equivalency” or

CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

I believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically, I support:

- Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level
- Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates
- Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries
- Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

Thank you for allowing my voice to be heard in the management process of this prized sport fishery,

Mikey Breen

**From:** [Justin Cooper](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment 7  
**Date:** Thursday, April 7, 2022 7:17:01 PM

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To whom it may concern:

My name is Justin Cooper. I live in Kennebunk Maine and fish for Striped Bass both recreationally for pleasure as well as as a Maine Guide for my business. I travel along the Striper coast so I have seen the many varied ways that Striped Bass are managed or mismanaged.

First and foremost I believe that Conservation Equivalency has been a very misused management tool in the fishery. It has allowed states to enact different regulations with the goal of achieving equivalent mortality reductions or increases.

I personally have watched and experienced significant catch reductions over the last several years following the Massachusetts increase in commercial fishing days. My fishing logs show devastation to the fishery. They have been able to target large breeding fish season after season and the fish that reach Maine have to travel through the gauntlet of this Commerical fleet in both the spring and fall migrations. I have fished among these fleets and watched them systematically wipe areas out.

I have fished in New Jersey and I have been concerned with their regulations and their bonus bass program.

There is no accountability for states using equivalency. Equivalency should not be used at all when striped bass are overfished. Commercial fishing should not be allowed when striped bass are over fished. Data used in equivalency proposals must meet the federal standard of 30 percent error or less.

Allowing deferred management would be a setback.

It is imperative that we use the most conservative recruitment triggers and fastest timeline for any rebuilding plans.

We must use the more recent conservative spawning success measures in calculations known as Low Recruitment Assumption.

New steps must be science based, actually quantifiable, and more importantly enforceable.

Having watched the mismanagement of other fisheries such as: winter flounder and Atlantic cod, I really want to stress the importance of taking definitive action now to protect Striped Bass.

I truly hope this special fishery will be allowed to once again thrive and become sustainable for all future anglers.

Thank you for your consideration,  
Justin Cooper  
32 Powder Mill Dr.  
Kennebunk, ME 04043  
Maine Guide and Recreational Angler

Sent from Coop's iPhone

**From:** [Austin Schofield](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [Caroline Johns](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 7, 2022 5:46:42 PM

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Hello,

Striped Bass are a most of the reasons I get out on the water each year. I am a catch and release fisherman in my 20's who spends their entire summer fishing for striped bass. I use fishing for striped bass as my social activity all summer. I spend over \$10k a year on fishing gear, charters, and fuel. On top of that I own a boat that is solely used for fishing and am looking at getting a second one.

One of my best friends just bought a new 23' boat just to target them in Boston harbor. We hope that this fishery can become fully catch and release in the future to protect the vulnerable fish stocks.

For the time being I fully support the stance of the American Saltwater Guide Association that is outlined below.

Thank you,  
Austin

## 4.1 Management Triggers

The theme to this section is "don't delay action." Many of the options included multi-year terms to activate the trigger. We suggest that the bulk of this section stay at "status quo" with a few exceptions. Generally, we like the triggers as they currently stand. What we don't like is the inaction by the Striped Bass Management Board once a trigger is tripped. Our message on this highly technical section is simple. If we followed the triggers all along, we wouldn't be in this mess. The biggest problem isn't the triggers. It is the Board's not reacting to them.

### Tier 1: Fishing Mortality (F) triggers

#### Option A: Timeline to Reduce F to the Target

**ASGA Supports Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year.

**Rationale:** By reducing fishing mortality to the target within one year, we would be reducing the number of fish removed from the system until that rate is at or below the target.

The only other option, sub-option A2, extends the timeline to reduce fishing mortality to two years. We have successfully achieved the status quo option two times since the last management amendment in 2003. As we have mentioned, the last thing the board needs is more time to react. Doubling the time to reduce F is not what is best for the resource or the fishermen.

We recognize that there is some uncertainty around only one year of recreational data collected through the Marine Recreational Information Program (MRIP). However, that uncertainty is dwarfed by the uncertainty associated with the Striped Bass Management Board lag in acting to end overfishing if it is indeed occurring.

### **Option B: F Threshold Triggers**

**ASGA Supports Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

**Rationale:** Much like sub-option A, there are only two options for the threshold trigger. B2 added an additional year just like A2 would do for the reducing F to target trigger. On paper, both sub-options A2 and B2 should state a minimum of two years. If the first year for either sub-option is the terminal year of a stock assessment, it could be longer than two years. In fact, it might be 3 or 4 years once the data comes in. For reference, the data used in the stock assessment currently used for decision-making has a terminal year of 2017.

### **Option C: F Target Triggers**

**ASGA Supports Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

**Rationale:** Option C should stay status quo for two reasons. First, to keep in line with the previous two choices in Options A and B. Second, this option denotes a relationship between F and the status of the SSB.

### **Tier 2: SSB Triggers**

#### **Option A: Deadline to Implement a Rebuilding Plan**

**ASGA Supports Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan.** The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

**Rationale:** A two-year response timeline lines up with the requirements for fish managed by the regional councils that operate under the requirements of the

Magnuson-Stevens Act. The closer we can get to federal management; the better off striped bass will be in the long run.

This is a very important facet of Amendment 7 because striped bass were declared overfished in 2018—nearly three years ago—and no rebuilding plan has been established. If this option is accepted, we can avoid this occurring in the future.

### **Option B: SSB Threshold Trigger**

**ASGA Supports Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

**Rationale:** If the stock becomes overfished, we need to address it as quickly as possible.

### **Option C: SSB Target Trigger**

**ASGA Supports Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

**Rationale:** Controlling fishing mortality is the number one tool to ensure stability in the stock. When the SSB declines, we must respond as quickly as possible.

### **Tier 3: Recruitment Triggers**

#### **Option A: Recruitment Trigger Definition**

**ASGA Supports Sub-option A2:** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA) shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

**Rationale:** This trigger needs to be updated. It was never tripped for the coastal stock even though we have experienced some very poor recruitment. It has been tripped once for the North Carolina stock since 2003. That means it is not really a trigger. When you do a retroactive analysis of the performance of A2, it would have been tripped three times since 2003. The other sub-option, A3, would have tripped six times since 2003. That may be too sensitive for management. Meaning that if a trigger is tripped too often it can be easily ignored. A2 seems like the best option. It will show us when recruitment is a concern while not being overly cautious and burdensome to striped bass management.



## **Option B: Management Response to Recruitment Trigger**

**ASGA Supports Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

**Rationale:** We need to be responsive to recruitment. Lowering F in response to periods of low recruitment is the only way to ensure a stable striped bass population. We have a history of exploiting good year classes and not responding to poor ones. This adjustment to the trigger will make the board more responsive to what science is telling us.

### **Tier 4: Deferred Management Action**

**ASGA Supports Option A (status quo):** No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

**Rationale:** We cannot delay management actions any longer. Status quo ensures that lengthy delays won't occur if this trigger is tripped.

### **4.2.2 Measures to Address Recreational Release Mortality**

The overview of this section is mixed for ASGA. We understand and accept that catch and release mortality represents a large portion of the overall fishing mortality. However, anglers release about 90% of the striped bass they catch. That has remained constant for the last four decades. Regulations have changed in the time frame. Large year classes have matriculated through the system, yet we still throw striped bass back as a choice. Therefore, we must manage this fishery for what it is. Striped bass are not black sea bass. Striped bass are not scup. Striped bass are a fish prized by catch and release anglers for the sport and must be treated as such. We do not support any no targeting closures. As long as bluefish swim in the ocean, this is an unenforceable regulation. Law enforcement has stated this fact multiple times.

To make matters worse, we found this on page 60 of Draft Amendment 7.

*Note on Estimating Reduction in Removals: No-targeting closures considered for Draft Amendment 7 are not intended to achieve a specific reduction in removals. Estimating the reduction in removals from a no-targeting seasonal closure depends on assumptions*

*about*

*changes in angler behavior, **which is highly uncertain.***

In other words, no targeting closures are currently not possible to quantify. It is hard for us to understand why guides would be expected to give up chunks of their season when ASMFC can not even tell us how many fish we would be saving.

To go a bit further on this topic we also found on page 57 of the document.

*The stock assessment currently applies a 9% hooking mortality rate to all recreationally released striped bass. This does not mean that every time a fish is released alive*

*it has a 9% chance of dying. Under some conditions, the released fish has a higher or lower*

*probability of dying, but overall, coastwide, it is assumed that 9% of all striped bass released*

*alive die.*

What we have here is an admission that the way that many of us fish for striped bass, with single, barbless hooks in cool, clean saltwater, most likely results in below 9% release mortality. This further lowers the assumed impact of no targeting closures. We can not support an option that is not enforceable and offers not quantifiable gains while taking away our ability to operate our businesses.

On paper, we would support sub-option B2-b, a no-harvest spawning closure, if we had more details. The way the sub-option is currently written, we aren't sure what it would do. There are already numerous no-harvest spawning area closures. This sub-option offered little regarding maps detailing the potential closure areas. We suggest that the Striped Bass Management Board address this issue in the addendum that will be started if the stock assessment update in October 2022 tells us we need to curb harvest further. We will have time to address the regulation changes before the 2023 season. The bottom line is that if we are going to do something, let's do it right.

**ASGA Supports Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**ASGA Supports Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

**Rationale for Sub-option C:** ASGA supports both C1 and C2 to address recreational release mortality. Sub-option C1 addresses the use of gaffs. Nets have become lighter and stronger over the years. The nylon mesh has been replaced with material

that doesn't remove a fish's protective slime. The current slot limit makes the ability to safely release a fish even more critical.

Sub-option C2 helps to close a loophole in the circle hook mandate. In the nutshell, this sub-option would require an angler to release a fish that was caught as bycatch and with a J-hook.

#### **Option D. Outreach and Education**

**ASGA: Supports Sub-option D2:** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

**Rationale:** We reached out to several of the ASMFC commissioners and asked their feedback on this issue. Everyone responded that their state was willing and able to meet the needs of this option. ASGA therefore supports D2.

#### **4.4 Rebuilding Plan**

We are in a very bad position with the striped bass stock. When the latest stock assessment was accepted in 2019, we curbed the F rate through Addendum VI. We did not address rebuilding. That means we have less time to get the job done. The poor recruitment in the Chesapeake is making this situation far worse. We don't have good year classes to rely upon.

If you go back in time to 2012, many concerned anglers were ringing the alarm bells about the stock. We knew from the numbers that striped bass SSB would be overfished by 2017. But the numbers for the 2011 year-class showed it was the fourth-best on record. Rather than take a greater-than-30% reduction in harvest, we bet on the 2011 year-class. The Chesapeake, meanwhile, only took a 20.5% reduction. The 2011s were going to save the day. Unfortunately, Maryland decimated the 2011s and the cohort did not recruit to the coastal migratory stock in the numbers we all wanted.

Fast forward to today and it is 2022, three years after a rebuilding plan should have been in place, and we are watching a stock in freefall with no year classes to replace them. What does rebuilding look like now?

In October 2022, we will finally get an update to the 2018 stock assessment. How will we handle this situation? Below is a glimpse into that question. The bottom line is that once again, the inaction of the Striped Bass Management Board has put us in a terrible position. This stock is not being managed for what it is and that is the core of the problem. Striped bass are an economic engine for the entire Atlantic coast. That

engine drives an economy that is based on abundance. Tackle shops, restaurants, hotels, and small-scale manufacturers have been crushed by the pandemic and subsequent supply chain and employment issues. Now, we don't have fish for anglers to catch. This is shaping up to be a disaster for striped bass and the economy they support. We can trace it all back to a few terrible decisions by ASMFC.

#### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

**ASGA Supports Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

**Rationale:** There are two options for rebuilding. One is rebuilding under a normal regime. The other option, B, is called a "low recruitment regime." Option B accounts better for what we are facing. The last three years of recruitment in Maryland's portion of Chesapeake Bay are the worst since 1979-1981.

We should be honest about the situation with striped bass. If we want to rebuild the stock, we must recognize that this needs to be done under a low recruitment assumption. Therefore, ASGA supports Option B.

#### **4.4.2 Rebuilding Plan Framework**

**ASGA Supports Option B:** 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 recruitment assumption specified in Amendment 7) 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.

**Rationale:** What exactly does Option B mean and why do we support it? The update to the stock assessment will come out in October 2022. This information may dramatically change everything we have done through Amendment 7. Option B directs the Board to address these potential needed changes to rebuilding as quickly as possible if the assessment shows that we need to do more. Rather than continue with more delays, we will have the ability to adjust removals before the 2023 season. Without this option, we would lose another year and be backed further into a rebuilding corner. None of this would be necessary if the Board had acted in 2018. But, here we are again.

An additional year could make a lot of difference in the pain we all will face through rebuilding. The only downside to this option is that public comment is limited since

time is of the essence. We will still be able to comment in some capacity, but it would be limited.

While we don't like this situation, we appreciate the motion and its addition to Amendment 7.

#### **4.6.2 Management Program Equivalency**

Management Program Equivalency is also known as Conservation Equivalency (CE). We have been screaming from the rooftops for years about the negative aspects of CE. CE allows states to create their own regulations. The CE process has been systematically abused by several states. It has limited the recovery of striped bass. It has led to states not meeting their conservation goals. It is the root cause of large year classes not contributing to the coastal stock in the volume that was expected. It is one of the leading causes of the current troubled state of striped bass.

*If there is one item you decide to comment on, this one should be it.* We must overwhelm the Striped Bass Management Board with our thoughts on CE. This is our chance to put some guardrails on CE and end the abuse of this management tool.

#### **Option B. Restrict the Use of Conservation Equivalency Based on Stock Status**

**Supports Sub-option B1-a:** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

**Rationale:** CE adds risk to fisheries management. Should we really be assuming that risk if the stock is below the management threshold? We don't think so. This is a simple option that rings true with us.

Flexibility in striped bass management might as well be a four-letter word. We don't need more flexibility. We need to manage this fishery for abundance. There will most likely be a lot of opposition to this option. It is critical that the Board hears your voice.

#### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

**Supports Sub-option C3:** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

**Rationale:** 30% is the precision standard for MRIP estimates that NOAA Fisheries considers reliable. This option would agree with current federal guidance. C1 and C2 would allow for the use of MRIP estimates with up to 50% and 40% PSEs,

respectively. We believe those levels bring extra risk to the process. Furthermore, states ultimately control the PSE associated with the fishery. For instance, a state can lower the PSE by increasing state-run surveys and dockside intercepts. The result of sub-option C3 will be a lower risk as well as improved recreational fishing data. That creates a win-win for fishermen as well as the resource.

### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

**ASGA Supports Sub-option D2:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

**Rationale:** What is an Uncertainty Buffer? If a state decides to use CE, there is a level of uncertainty that should be factored into management. As an example, if states are required to lower harvest by 100 fish, a state that uses CE would have to come up with a plan that would curtail harvest by 25% more, or 125 fish. We have used the term "luxury tax" to describe this.

The fact that this option is in Amendment 7 is validating. If CE wasn't a problem, we would not see this in Amendment 7. It will make states think about using CE because it will cost them more on the front end. We originally advocated for accountability on the back end. If a state exceeded harvest, they would have to pay for it the next year. In some ways this is better because it will make them stop and think before they submit their plans.

Sub-options D1 and D3 would establish buffers of 10% and 50%, respectively, while D2 sits in the middle at a 25% buffer. If you look at the performance of some states that use CE, the 25% number because more justifiable.

### **Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

**ASGA Supports Sub-option E2:** the percent reduction/liberalization projected for the FMP standard at the state-specific level.

**Rationale:** What the heck does this mean? We are going to call this the New Jersey Rule. Why? Because during the Addendum 6 process, we needed to take a coastwide reduction of 18.5% to end overfishing. The slot limit meant different things for different states. States that harvest more have to take more of a reduction. Take a look at the numbers and this will become clear.

Table 1 Description automatically generated



During the Addendum 6 process, the coastal regulations translated into a 40%+ reduction for New Jersey and a minimal reduction for states like Maine and New Hampshire. New Jersey felt this wasn't fair. New Jersey said everyone should take an 18.5% equally. This was brought up at the end of a long day. Many on the Board did not fully grasp the ramifications.

The board voted for New Jersey and allowed each state to take an 18.5% reduction instead of the coastwide numbers. We are very lucky that we met the coastwide reduction of 18.5%. However, not only did New Jersey not meet their goals, but they also ultimately took no reduction, the worst showing for any state.

Therefore, we must select option E2. It was put in this document specifically to address what is described above. We can't let this happen again.

Thank you,  
Austin Schofield  
**Marina Success Manager**  
(O): (857) 242-1441  
[austin.schofield@dockwa.com](mailto:austin.schofield@dockwa.com)

[See What Marinas and Boaters are Saying About Dockwa](#)  
[Dockwa Has Solutions for Dry Storage](#)

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**From:** [Flynn Willsea](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Management Amendment 7  
**Date:** Thursday, April 7, 2022 5:46:12 PM

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To whom it may concern,

My name is Flynn Willsea, I am an avid rec fly fishing angler and work on a charter boat in the summer time that primarily targets striped bass in Maine. My plan for my career in the coming years is to start my own fishing guides service targeting striped bass, and for that to be possible there must be bass in the ocean. Therefore, I would like to voice my concern for the stock of striped bass through striped bass management amendment 7.

For Tier 1: Fishing mortality (F) triggers  
for each option I would like to see the status quo. I believe this will offer the most efficient and helpful response to aiding striped bass

For Tier 2: SSB triggers  
For option A I would like to see management choose suboption A2  
For option B I would like to see management choose suboption B1 the status quo  
For option C I would like to see management choose suboption c1

For Tier 3: Recruitment triggers  
For option A I would like to see management choose suboption A2  
For option B I would like to see management to suboption B2

For Tier 4: Deferred management  
For this tier I would like to voice that I support option A for no deferred management. Deferred management is a terrible way to manage a fish stock that is already experiencing overfishing. Regulation must be uniform across state lines to prevent one state from overharvesting. This is especially necessary for a species like striped bass whose range extends from NC to ME.

I hope we can help the bass. They deserve it.

Thank you,  
Flynn Willsea

**From:** [Roger Clark](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 7, 2022 5:43:41 PM

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Please save our striper population. I live on the Kennebec River in Maine. Our striper population has been substantially reduced over the last 10 years. Many guides have sold their boats. In fact, our local tackle shop had to close because of the lack of fish. We are at the Northern end of the migration, so we definitely feel the impact of striper management practices. Please stop the commercial fishing of striped bass. It should be a game fish only. Commercial fishing has ruined the livelihood of many guides and related merchants in my area. Maine is not a wealthy state and we need to attract fisherman and tourism. The economic impact of your decisions have very serious and lasting consequences up her in Maine.

Roger Clark  
Phippsburg, Maine

**From:** [Corcuera Thomas](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment 7  
**Date:** Thursday, April 7, 2022 5:01:52 PM

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I think you should lint the commercial fisherman and not the recreational fisherman because they take a lot more fish  
[Sent from Yahoo Mail for iPhone](#)

**From:** [Keith Mars](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 7, 2022 4:47:51 PM

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Thank you for the opportunity to comment on the Interstate Fishery Management Plan for Atlantic Striped Bass Draft Amendment 7. I understand this is a very complex issue and requires a thoughtful, yet equally complex approach. I do not know the intricacies of what is plaguing Atlantic Striped Bass, but I do know the challenges are fierce and our time to take action is closing. I strongly encourage the ASMFC to do what is necessary to rebuild this fishery for generations to come. That means taking action on triggers, closing fisheries during spawning, limiting harvest and seasons, and applying resources to freshwater stream inflow capital projects. I encourage you to take a different path that we see in the Pacific Northwest of inaction or letting perfection be the enemy of the good. Thank you for your time and public service.

Regards,

Keith Mars

**From:** [Nick DeGennaro](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 7, 2022 4:37:45 PM

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My name is Nicholas DeGennaro and I am an avid boat fisherman from the state of New Jersey. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment. Striped bass are a very important species to both anglers and businesses. Eliminating the striped bass fishery for recreational anglers would be catastrophic for all involved.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and hope that my voice will be heard.

Sincerely,

Nicholas DeGennaro  
Barnegat, New Jersey  
Email: [nickdeg98@gmail.com](mailto:nickdeg98@gmail.com)

**From:** [Mark McGowan](#)  
**To:** [Comments](#)  
**Cc:** [Emilie Franke](#)  
**Subject:** [External] Public Feedback prior to April 15, 2022 for ASMFC Approval of Draft Amendment 7 to the Striped Bass Management Plan  
**Date:** Thursday, April 7, 2022 3:37:25 PM

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Dear ASMFC representatives,

My name is Mark McGowan, I am an avid fisherman with great concern for the wellbeing of our Striped Bass Fishery. My family business, Cow Harbor Bait & Tackle on Long Island, N.Y., is a small business that relies on a strong fishery to generate income, pay salary and continue to contribute sales tax for New York.

I know you must read many of these letters so I will respectfully be direct to save your valued time:

1. I have noticed less Striped Bass being caught by many customers with exception of some skilled fishermen.
2. While there are many issues facing the general fishery which need addressing; this letter is focused on Draft Amendment 7 to boost the biomass of Striped Bass.
3. Striped Bass generate many jobs, provide fishing opportunities for the recreational fishing public and contribute tax dollars to many states.
4. A larger biomass is essential for the long-term health of both the Striped Bass and the fishing industry catering to tax paying citizens.
5. Commercial harvesting should be limited to hook only, Siene netting should be banned outright, no exceptions including fish traps.
6. Action is needed to increase the biomass of Striped Bass with respect to conservation, industry and popular public opinion.

Thank you for your valued time,

Mark McGowan

From: [Mark Brown](#)  
To: [Comments](#)  
Subject: [External] Draft Amendment 7  
Date: Thursday, April 7, 2022 2:58:00 PM

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Capt. Mark Brown  
Mark's Charters  
3551 Revolea Beach Road  
Middle River, MD 21220

April 7, 2022

Ms. Emilie Franke  
FMP Coordinator  
1050 N. Highland St., Suite 200 A-N  
Arlington, Va. 22201

Dear Ms. Franke,

I am writing as a member of both Maryland Charter Boat Association and Upper Bay Charter Captains Association, organizations who support sustainable sport fishing and local tourism.

In 2020 Maryland acted to reduce Striped Bass harvest by 18% and a total of 28% including commercial harvest. Under Addendum VI our industry's season has been shortened significantly. 13 days of our Spring fishery, 16 days of our summer fishery and 5 days of our winter fishery were eliminated. As part of Maryland's efforts under the addendum our industry has partnered with fishery management staff and participated in the FACTS reporting system. Both organizations are thankful for their relationship with the State of Maryland to help better the resource. The hope of our reporting is to ensure fishery managers are provided with timely and accurate data. We feel that for-hire harvest data is as accurate and predictable as that collected from the commercial fishery in Maryland, and more comprehensive. When comparing data from 2021 to 2018 we have reduced our harvest by 25.3%. The viability of the for-hire fleet on Chesapeake Bay should hinge on its own data and not MRIP estimates.

As an industry we have met option B1-A effort controls proposed by ASMFC in Amendment 7. Our business models are reliant on a fishery that attempts to avoid unnecessary catch and release. We utilize the best techniques and gear to try to eliminate dead discards during our trips and we strongly believe our release mortality rate is equivalent to, or lower than, the commercial fishery in Maryland. We feel that we are already operating within the required reduction of 15% of directed trips proposed in Amendment 7 and that extending the existing closures is unnecessary for the for-hire fleet. Our opinion is that reducing creel limits further would result in unnecessary catch and release and that these measures would spell dire



consequences for the viability of the for-hire fleet on Chesapeake Bay.

Regarding the specifics in the proposed amendment, I believe the F trigger should be based on a two year average and there should be flexibility to defer action when a trigger is tripped. For example this year's fishing effort could be reduced significantly due to rising fuel prices. I am in favor of the standard recruitment method being used for the 2022 assessment and the addendum process if a reduction is needed. I don't believe default CE restrictions are necessary especially taking into account what has been achieved so far under Addendum VI. Different regions and sectors of the fishery need the flexibility of CE. CE and other management efforts are intertwined. Maryland's current seasonal closures are both a CE action and an effort to reduce release mortality according to fishery managers. CE is vital to both management efforts and the survivability of the for-hire fleet in Maryland in my view.

As sportsmen and business owners we at MCBA and UBCCA are stewards of Maryland's State Fish and support regional conservation efforts. We understand the sacrifices we have had to make and are hopeful the fishery we rely upon will be restored under Maryland's current management strategy.

Sincerely,

Capt. Mark Brown

**From:** [Bullen, Dana](#)  
**To:** [Comments; Capt. PETER FALLON](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 7, 2022 2:30:10 PM

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Good afternoon.

My name is Dana Bullen and I am blessed to fish for striped bass in the lower Kennebec River a dozen days each year. I have introduced my immediate family, extended family and many friends to the sport. Every day on the water is a special day.

Amendment 7 is concerning to me on many levels. The three most concerning are:

- The concept of Conservation Equivalency. The State's use of this tool lacks accountability.
- Seasonal Closures are not an acceptable way to reduce striper mortality.
- We cannot afford to weaken existing Management Triggers.

As I follow the decisions that are made, I hope the appropriate actions are taken to allow many continued days on the water.

With respect,

Dana

**From:** [David Flanagan](#)  
**To:** [Comments](#)  
**Cc:** [Emerson Hasbrouck](#); [Maureen Davidson](#); [James Gilmore](#); [CAROL HOFFMAN](#); [Sen. TODD KAMINSKY](#)  
**Subject:** [External] Amendment 7 (Striped Bass Conservation and Preservation)  
**Date:** Thursday, April 7, 2022 2:14:35 PM

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To all concerned parties.

I am writing here today to show my support the conservation and preservation efforts needed to help make our beloved Striped Bass fishery sustainable for years to come.

Clearly there are a lot of mixed feelings on the current status of the striped bass population. As a Fly and Light Tackle fishing guide on Long Island, I am very concerned about the population of striped bass and the mismanagement that has gone on since the rebound after the moratorium back in the late 80's. I have been fishing for striped bass since I was a child (born in 86) and I have seen the excellent fishing, and the not so great fishing that we have encountered in my last 35 years.

Here are the options that I am in favor of, which seem to be the best options for protecting and rebuilding this wonderful species.

#### **4.1 Management Triggers**

I am in support of options

Tier 1 Fishing Mortality Triggers: A1, B1 and C1  
Tier 2 Spawning Stock Biomass Triggers: A2, B1 and C1  
Tier 3 Recruitment Triggers: A2 and B2  
Tier 4 Deferred Management Plan: Option A (Status Quo)

#### **4.2.2 Measures to Address Recreational Release Mortality**

I am in support of options

C Additional Gear Restrictions: Sub-Option C1 and Sub-Option C2  
D Outreach and Education: Sub-Option D2

#### **4.4 Rebuilding Plan**

I am in support of options

4.4.1 Recruitment Assumption for Rebuilding Calculation: Option B

4.4.2 Rebuilding Plan Framework: Option B

#### **4.6.2 Management Program Equivalency**

I am in support of options

Option B Restrict Use of Conservation Equivalency Based on Stock Status: Sub-Option B1-a

Option C Precision Standards for MRIP Estimates Used in CE Proposals: Sub-Option C3

Option D CE Uncertainty Buffer for Non-Quota Managed Fisheries: Sub-Option D2

Option E Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries: Sub-Option E2

Thank you for your time and consideration.

Sent from [Mail](#) for Windows

**From:** [Parker Mauck](#)  
**To:** [Comments](#)  
**Cc:** [stripcomments@gmail.com](mailto:stripcomments@gmail.com); [Dan Mckiernan](#); [Raymond Kane](#); [Sarah.Peake@mahouse.gov](mailto:Sarah.Peake@mahouse.gov); [Michael Armstrong](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 7, 2022 2:03:58 PM

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Dear ASMFC,

I have been fishing for Striped bass as a recreational angler for over 30 years, and in 2020 I became the co-founder of Westport Fly, a guide service operating out of Westport, Massachusetts. The economic value of a healthy Striped Bass population cannot be overstated for me, my company, my town, and the Commonwealth of Massachusetts. But, you already know this. I am very concerned by the many poor spawning year classes in recent years and the decline in the diversity of Striped Bass sizes we are seeing in our waters. Please listen to the urging of all the anglers up and down the Atlantic coast that need the ASMFC to manage Striped Bass to *ABUNDANCE*. Whether we are guides, recreational anglers, or commercial anglers, abundance benefits everyone. Thank you for noting and considering my positions below on the many items being discussed in Draft Amendment 7.

Sincerely,  
Captain Parker Mauck  
PO Box 42  
69 Masquesatch Road  
Westport Point, MA 02791

## 4.1 Management Triggers

### Tier 1: Fishing Mortality (F) Triggers

#### **Option A: Timeline to Reduce F to the Target**

***I support Sub-option A1:*** Reduce F to a level that is at or below the target within one year.

#### **Option B: F Threshold Triggers**

***I support Sub-option B1:*** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

#### **Option C: F Target Triggers**

***I support Sub-option C1:*** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

### Tier 2: Spawning Stock Biomass (SSB) Triggers

#### **Option A: Deadline to Implement a Rebuilding Plan**

***I support Sub-option A2:*** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

#### **Option B: SSB Threshold Trigger**

***I support Sub-option B1:*** If female SSB falls below the SSB threshold, the striped

bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

#### **Option C: SSB Target Trigger**

***I support Sub-option C1:*** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

### **Tier 3: Recruitment Triggers**

#### **Option A: Recruitment Trigger Definition**

***I support Sub-option A2:*** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

#### **Option B: Management Response to Recruitment Trigger**

***I support Sub-option B2.*** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

### **Tier 4: Deferred Management Action**

#### ***I support Option A: No Deferred Management Action.***

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

## **4.2.2 Measures to Address Recreational Release**

### **Mortality**

#### **Option C. Additional Gear Restrictions**

***I support Sub-option C1:*** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

***I support Sub-option C2:*** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

#### **Option D. Outreach and Education**

***I support Sub-option D2:*** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

## **4.4 Rebuilding Plan**

### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

***I support Option B:*** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using

the low recruitment regime assumption as identified by the change point analysis.

#### **4.4.2 Rebuilding Plan Framework**

***I support Option B:*** 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 recruitment assumption specified in Amendment 7) 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.

### **4.6.2 Management Program Equivalency (Conservation Equivalency)**

#### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

***I support Sub-option B1-a:*** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

#### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

***I support Sub-option C3:*** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

#### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

***I support Sub-option D2:*** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

#### **Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

***I support Sub-option E2:*** the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Capt. Parker G. Mauck

[pgmauck@gmail.com](mailto:pgmauck@gmail.com)

(508) 496-8682

[www.westportfly.com](http://www.westportfly.com)



**From:** [Robin Calitri](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 7, 2022 1:56:02 PM

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Dear Delegates,

- As a charter Captains who target Striped Bass in New Hampshire we would urge you to consider carefully the positions taken by the American Saltwater Guides Association regarding management of the species. We have tagged or fin clipped over 400 Stripers in the past few seasons by participating with the American Littoral Society and the University of New Hampshire. The majority of those fish will enter the realm of the 28" – 35-inch slot limit this season or next. Virtually every fish we catch, and release seems to be from one- or two-year classes. In the Piscataqua drainage there are few keepers and ever fewer large Stripers. We would support making Striped Bass a gamefish to ensure the future of our fishery. However, it seems that that option is not being considered. Therefore, we urge you to adopt measures which are most restraining on anglers and aimed at maximum health of the species. Please adopt the most conservative measures for Amendment 7.
- **Conservation Equivalency (CE)** has been the most misused management tool in this fishery. It allows states to enact different regulations with the goal of achieving equivalent mortality reductions or increases. There's no accountability for states using CE's: the data limitations often can't support the use of CE's; and the track record for many CE's is appalling. [Sec. 4.6] We need the following guardrails:
  - No CE's permitted when striped bass are overfished.
  - Data used in CE proposals must meet the federal standard of 30 Percent Standard Error or less.
  - We need a 25% Uncertainty Buffer (front-end margin of error) built into any CE.
  - Equivalency for CE proposals must meet the state-specific level.
- We can't afford to weaken any existing Management Triggers nor delay implementation of action as the result of a Trigger. Allowing Deferred Management Action would be a setback. [Sec. 4.1]
- We need the most conservative recruitment triggers and fastest timeline for any required rebuilding plan. [Sec. 4.1]
- Seasonal Closures, as outlined in this draft, are not a reliable way to reduce striper mortality. Any new steps must be science-based, quantifiable, and enforceable. [Sec. 4.2]
- We must use the more recent, more conservative spawning success measures in calculations known as Low Recruitment Assumption. [Sec. 4.4]

Once done, please begin to address some of the issues surrounding the antiquated, unnecessary, and destructive commercial practices along the East Coast. Very few commercial fishermen are full time or rely only on revenue from Striped Bass for their livelihood. High grading leaves yards of dead Stripers in certain localities, shore-based fish traps destroy a local fishery. Gillnetting is not only destructive but can wipe out a localized school of fish in a day. Any 'trophy catch results in the removal of millions of eggs. By-catch allowances breed abuse.

Another issue is to address the forage fish health and the devastating impact of near shore



harvested by large commercial enterprises.

We realize that some will complain that taking fish for the table is necessary for business but not in our services of the 100 or so clients on our boats last season, not one killed a Striper for the table.. Thank you for your service and for negotiating the political pressure of various groups. Let them Grow.

Sincerely,

Captains Robin, Scot and Todd Calitri

Seacoast Fly Fishing

April 7,2022

**From:** [James Doll](#)  
**To:** [Comments](#)  
**Subject:** [External] amendment 7, Striped Bass recovery  
**Date:** Thursday, April 7, 2022 1:55:28 PM

---

Hello

Regarding striped bass recovery and amendment 7.

It is absolutely imperative that we put our efforts into restoring the environment, this includes the striped bass. As the implications of recovering such a simple fish would have long-term impacts on recovering other wildlife fish species. Restoring balance in the environment is critical more so now than ever.

Biblical statements in certain religious texts has led a lot of foundational beliefs that "mankind is lord and dominion over all things plant and animal" perhaps this is what that text refers to.

Personally I believe that these fish will not recover without humans intervention.

That being said it is absolutely imperative that we adjust the long-term recovery plan to insure proper management measures to ensure high levels of stock of this fish for generations to come.

Thank you so much for your time.

**From:** [Dan Reiners](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, April 7, 2022 12:08:42 PM

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Hello,

As a newer recreational striper angler, I am just coming up to speed about the regulatory situation for striped bass and how the ineffective management so far has really hurt the stocks and prevents us from having a truly sustainable fishery.

We shouldn't be looking to maintain a minimum level of Striped Bass but to maintain a fully sustaining healthy population that will withstand sustained poor recruitment, or shifts in climate. This means I support several changes as part of Amendment 7.

First we need to restore Spawning Stock Biomass (SSB) and implement quicker restoration plans, of at most two years. We must also adjust mortality to increase SSB across the entire range. These changes should include changing slot sizes or changing the numbers that can be taken.

Also we need to address the Recreational Release Mortality issue, and reduce that level, there may not be regulatory remedies for this but it will require investment in education of recreational anglers, including outreach in multiple languages which is not always happening to educate all anglers.

We all have a vested interest in keeping this fishery healthy for recreation as well as for a wider healthy ecosystem by maintaining a population beyond just the minimally sustainable numbers.

Thanks,  
Dan Reiners

**From:** [George Sylvestre](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [Michael Armstrong](#); [Dan Mckiernan](#); [Raymond Kane](#); [Rep. Sarah K. Peake](#)  
**Subject:** [External]  
**Date:** Thursday, April 7, 2022 12:00:08 PM

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Dear All,

My name is George Sylvestre. I run a small fly fishing guide service on Cape Cod with my three sons, am a contributor to On The Water magazine, and the New England editor of On The Fly magazine.

Atlantic striped bass are nearly a religion for my community and they are absolutely crucial for the future of my family's business. I urge you in the strongest way possible to incorporate any and all changes to striped bass management practices that will return the fishery to abundance and sustain it there for years to come.


**My specific request is for you to support the following measures in Amendment 7:**

- Fishing Mortality (F) triggers - sub-option A1 (status quo)
- Threshold Triggers - sub-option B1 (status quo)
- Target Triggers - sub-option C1 (status quo)
- SSB Triggers - Deadline to Implement a Rebuilding Plan sub-option A2
- SSB Threshold Trigger - sub-option B1 (status quo)
- SSB Target Trigger - sub-option C1 (status quo)
- Recruitment Triggers: Recruitment Trigger Definition - sub-option A2
- Management Response to Recruitment Trigger - sub-option B2
- Deferred Management Action - Option A (status quo)
- Measures to Address Recreational Release Mortality - sub-options C1 and C2
- Outreach and Education - sub-option D2
- Recruitment Assumption for Rebuilding Calculation - option B
- Rebuilding Plan Framework - option B
- Management Program Equivalency: Restrict the Use of Conservation Equivalency Based on Stock Status - sub-option B1-a
- Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals - sub-option C3
- Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries - sub-option D2
- Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries - sub-option E2

Respectfully,

George Sylvestre, CCI

<https://sylvestreoutdoors.com/>

7814888642 



**From:** [James Billingsley](#)  
**To:** [Comments](#)  
**Subject:** [External] KAF Comments on Draft Amendment 7  
**Date:** Thursday, April 7, 2022 11:44:49 AM

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Dear Ms. Franke,

As an east coast striped bass angler, I support balancing precautionary management with regulatory stability and reasonable access to the fishery. The striped bass are such a valuable asset to the east coast. The fish alive are worth so much more alive than as an eating fish. The capital striper fishing brings to tackle shops, and fishing communities in invaluable and will vanish, as the fishery vanishes. To achieve that, I support the following management options.

Management Triggers:

Fishing Mortality Triggers:

Timeline to Reduce F to the Target, I support Sub-option A1 (status quo) 1 year.

F Threshold Trigger, I support Sub-option B1 (status quo) If F exceeds the threshold in a single year, action must occur to reduce F to the target within timeframe selected under sub-option A (supported A1 above).

F Target Trigger, Support Sub-option C1 (status quo) if F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, must reduce F to a level that is at or below the target within the timeframe selected under sub-option A (supported A1 above).

Spawning Stock Biomass Triggers

Deadline to Implement a Rebuilding Plan, I Sub-Option A2: Two-Year Deadline

SSB Threshold Trigger, I support Sub-option B1 (status quo) Rebuild when SSB in a single year falls below the threshold.

SSB Target Triggers, I support Sub-option C3. No management trigger related to SSB target because F target trigger also has an SSB target component and managers directly control F.

Recruitment Triggers

Recruitment Trigger Definition, I support Sub-option A2: Moderate Sensitivity Recruitment Trigger.

Management Response to Recruitment Trigger, I support a variation of Sub-option B2. The Board use an interim F target calculated using the low recruitment assumption and then during the next stock assessment it evaluates F against the new interim F target and simultaneously evaluates all the other management triggers to determine if action is needed.

Deferred Management Action, I support Option A. No deferred management action. Stock assessments following a management change should be scheduled to enable evaluation of two fishing years under the new management measures providing an opportunity for the population to react to the corrective management action while creating management stability for at least two years.

Measures to Address Recreational Release Mortality

Seasonal closures, I support Sub-options B2 Spawning Area Closures.

Gear restrictions, I support Sub-options C1 and C2.

Outreach and Education, I support Sub-option D1. States are required to promote best striped bass handling and

release practices by developing campaigns.

Recruitment Assumption for Rebuilding Calculation, I support Option B. Use a low recruitment assumption for the 2022 stock assessment.

Rebuilding Plan Framework, I support Option B. Enable ASMFC to respond quickly through Board action.

Management Program Equivalency, I support Sub-options B1-A and B1-C, C3, and D1.

Thank you for the opportunity for allowing me to share my thoughts on this important issue.

Sincerely,

James Billingsley  
15 Thistle Ln  
Rye, NY 10580  
jlbillingsley05@gmail.com

**From:** [Tony Richard Outdoors](#)  
**To:** [Comments](#)  
**Subject:** [External]  
**Date:** Thursday, April 7, 2022 11:38:10 AM

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My name is Tony Richard 33 years old and my passion for the striped bass started when I was really young and I have since learned everything I can about them and continue to learn more they are my favorite fish to catch



**From:** [Bryan Coppede](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7 Comments  
**Date:** Thursday, April 7, 2022 10:26:00 AM

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Dear ASMFC Board,

My name is Bryan, I live in Brooklyn, NY, and fish for striped bass in Jamaica Bay. I only started fishing a few years ago, and am shore bound without a boat. My tool of choice is a fly rod. That said, I have developed a passion for fishing, and standing in waters of the Bay is my direct, visceral connection to nature, one that I crave living in the densest city in the country. I need that time in nature to recharge and restore. Fishing is one of my methods to achieve balance in my life.

I support the conservation of striped bass and a rebuilding of the stock. (I like to fish over water that has fish in it. I can practice my casting in the park.) I also want to preserve the fishery for my young son, who I hope to introduce to fishing as he grows older. It will be a tragedy if the striped bass stock collapses, and a preventable one at that. As such, I feel strongly about the issues on the table with regard to Draft Amendment 7. Below are my comments to that document.

As this is a complex document, I am relaying my comments according to sections.

## **4.1 Management Triggers**

### **Tier 1: F Triggers**

I support the following sub options:

- Option A: I support sub option A1.
- Option B: I support sub option B1.
- Option C: I support sub option C1.

### **Tier 2: SSB Triggers**

I support the following sub options:

- Option A: I support sub option A2, the two year deadline to implement a rebuilding plan. This is crucial.
- Option B: I support sub option B1.
- Option C: I support sub option C1, again this is crucial, and I strongly support this sub option.

### **Tier 3: Recruitment Triggers**

I support the following sub options:

- Option A: I support sub option A2.
- Option B: I support sub option B2.
- Let's get common sense triggers in place that will rebuild the stock.

### **Tier 4: Deferred Management Plan**

I support the following:

- I support Option A.

## **4.2.2 Measures to Address Recreational Release Mortality**

Option C - Additional Gear Restrictions

I support the following sub options:

- Option C: I support sub options C1 and C2. These are common sense.

Option D - Outreach and Education

- I support sub option D2.

## **4.4 Rebuilding Plan**

### **4.4.1 Recruitment Assumption For Rebuilding Calculation**

Option B

- I support Option B, rebuilding female SSB to the SSB target by 2029.

### **4.4.2 Rebuilding Plan Framework**

Option B

- I support Option B.

### **4.6.2 Management Program Equivalency**

I support the following sub options:

- Option B: I support sub option B1-a.
- Option C: I support sub option C3.
- Option D: I support sub option D2.
- Option E: I support sub option E2.

Now I could expound individually on all of the above options of 4.6.2, but I will not, and rather keep my comment concise. No one gets a free pass. Everyone sacrifices to rebuild the stock, and no states are special or get special exemptions without a buffer restriction. I sure as hell am not ok with another state killing more fish while I wonder up here in New York City where all the striped bass went. Someday in the future I want to sit on my chair and watch my son and his friends chase a striper blitz down the beach, not lament at what used to be.

This is an extremely complex document, and I spent hours reading and listening to others break this down into terms I could understand so I can comment (thank you Tony).

I hope the Board takes my comments into consideration as it finalizes Amendment 7.

Thank you for your time.

Best,  
Bryan

**Bryan Coppede**  
New York | San Francisco  
Photographer | Director

(917) 620-7014

[bryancoppede.com](http://bryancoppede.com)

IG: [@bryancoppede](https://www.instagram.com/bryancoppede)

**Represented by:**

Freda Scott Creative

[freda@fredascott.com](mailto:freda@fredascott.com)

(650) 548-2446

**From:** [David Slater](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Thursday, April 7, 2022 9:28:15 AM

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To whom it may concern at ASMFC,

I am a 4th grade teacher in Massachusetts and regardless of your views, both political and scientific on Covid, I can attest to the stress it has caused 44 students (my 2020-2021 and 2021-2022 classes) and myself. I tell you this because of the solace I found through striped bass fishing. Fishing for stripers provided me with moments of peace and allowed me to turn off the noise and focus on one task - just me, the beach, and fish. The peace I have found through fishing has allowed me to continue teaching children and hopefully provide them with a positive, fun, and educational experience. Why am I telling you this? It's because striped bass not only affects our coastal economies, it also provides opportunities for people to connect with nature and unplug. For this reason, I believe that action must be taken to support these fish. We must manage these fish for abundance to ensure both economic and mental health opportunities. After reading several blogs and listening to podcasts about Amendment 7, I believe the selections on the following list helps to ensure the recovery of striped bass.

4.1	4.2	4.4.1	4.4.2	4.6.2
Tier 1 - A1, B1, C1	B- None C1, C2, D2	B	B	B1-a, C3, D2 E2
Tier 2 - A2, B1, C1				
Tier 3 - A2, B2				
Tier 4 - A				

Thank you and tight lines,

David Slater

**From:** [kkirbynab](#)  
**To:** [Comments](#)  
**Subject:** [External] Stripped Bass conservation  
**Date:** Thursday, April 7, 2022 9:11:49 AM

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Eliminate commercial permits for targeting only stripped bass. It's literally blood money and many fishermen skirt the terms of their permits. Nighttime catches are easily turned into backdoor, illegal sales. It is simply too hard to enforce these permits. Shut it down.

Sent via the Samsung Galaxy S®6 active, an AT&T 4G LTE smartphone

**From:** [Darryl Sampson](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, April 7, 2022 9:06:26 AM

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Good morning,

My name is Darryl. And I am a striper fisherman.

From April to October I chase Striped Bass from Rhode Island to Maine.

I live in Kingston Massachusetts and consider the 3 Bays area my home waters.

My writing of this email is in specific regards to "Conservation Equivalency"

"CONSERVATION EQUIVALENCY IS NEITHER CONSERVATION NOR EQUIVALENT"

The playing field needs leveling and interstate regulations need to be the same.

Thank you for your time.

Darryl Sampson

**From:** [1984eta@gmail.com](mailto:1984eta@gmail.com)  
**To:** [Comments](#)  
**Subject:** [External] Comment for Draft Amendment 7  
**Date:** Thursday, April 7, 2022 8:54:05 AM

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My name is Eduardo Tosatto and I am an avid surfcaster from the state of Massachusetts. History will repeat itself if we don't take action now, why wait, striped bass as a game fish will generate plenty of commerce, commercial fishing needs to be reduced drastically if not eradicated. I want my son and his son to enjoy the fish and fishing I do and has brought me so much happiness, adventure, respect for the ocean and marine life and knowledge. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Eduardo Tosatto  
Northborough, Massachusetts  
Email: [1984eta@gmail.com](mailto:1984eta@gmail.com)

Eduardo Tosatto  
[@moronesaxatilis](https://twitter.com/moronesaxatilis)



**From:** [Michael O'Rourke](#)  
**To:** [Comments](#)  
**Subject:** [External] Comments on amendment 7  
**Date:** Thursday, April 7, 2022 7:48:49 AM

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My name is Michael Orourke and I am an avid boat fisherman from the state of New York. Stripers are the corner stone of fishing in northeast. From April to December many of us on the coast spend the majority of our days, and more often nights to finding these beautiful fish. They are more than just a source of food, there are fish with much better stocks that can step in for dinner. Stripers are the king of inshore sport fish in the northeast. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Michael Orourke  
Hicksville, New York  
Email: [morourke1323@gmail.com](mailto:morourke1323@gmail.com)

**From:** [Carl DiRocco](#)  
**To:** [Comments](#)  
**Subject:** [External] AMENDMENT 7  
**Date:** Thursday, April 7, 2022 6:58:22 AM

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To the ASMFC:

My name is Carl DiRocco and I am sending you my comments on the proposed Amendment 7, for the management of striped bass , as requested by the ASMFC call for public comment.

My choices are as follows:

4.1

Tier 1: A1, B1,C1

Tier 2: A2, B1,C1

Tier 3: A2, B2,

Tier 4: A, 4.2,  
B-None  
C1, C2  
D2  
4.4.1  
B  
4.4.2  
B  
4.6.2  
B1-a  
C3  
D2  
E2

I hope the management board makes conservation of the species and rebuilding the population as there most important objectives.

I am personally on board with whatever measures are necessary to achieve those two goals as quickly as possible.

Thank You

Carl DiRocco  
Phillipston, Massachusetts

**From:** [Rich Strzepek](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] FW: Striped Bass Amendment 7 comments  
**Date:** Wednesday, April 6, 2022 11:01:19 PM

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To the ASMFC

I have fished for striped bass in my native Rhode Island and my home on Long Island, New York for 62 years and have experienced the decline in the striped bass fishery. Following are my recommended choices for Amendment Seven effecting the management of striped bass.

**4.1**

**Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

**Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

**Tier 3**

Option A- Support A3

Option B- Support B2

**Tier 4**

Support A

**4.2**

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D1

**4.4.1**

Support B

**4.4.2**

Support B

**4.6.2**

Option B- Support B1-a

Option C- Support C3

Option D- Support D3

Option E- Support E2

I believe the guiding principle for all decisions for Tiers 1 through 4 striped bass management is to manage the fishery for abundance and not based on yield to end overfishing as quickly as possible. .

Thank you for considering my comments.

Richard E. Strzepek

Mattituck, NY 11952

**From:** [Justin Gonsalves](#)  
**To:** [Comments; striperscomments@gmail.com](#)  
**Subject:** [External] Amendment 7  
**Date:** Wednesday, April 6, 2022 10:04:07 PM

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Hello,

My name is Justin Gonsalves, I live in Kittery, Me. I've grown up fishing the coasts of New England and the Canadian Maritime primarily targeting Striped Bass and Atlantic Salmon. I would like to leave my comments for your consideration relating to Amendment 7.

**As it relates to section 4.1 Management Triggers, I would like to see the Striped Bass Management Board take immediate action to triggers and not delay. I am in support of the following.**

**Tier 1:**

**Option A1** - reduce F to a level that is at or below the target within one year.

**Option B1** - if F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the time frame selected under Option A.

**Option C1** - if F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

**Tier 2**

**Sub-option A2** - two-year deadline to implement a rebuilding plan. The Board must implement a rebuilding plan within two years from when the SSB-based management trigger is triggered.

**Sub-option B1** - if female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe (not to exceed 10 years)

**Sub-option C1** - if female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within the established timeframe (not to exceed 10 years).

**Tier 3**

**Sub-option A2:** - The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA) shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

**Sub-option B2:** - If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

**Tier 4**

**Option A:** - No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

**As it relates to section 4.2.2 Measures to Address Recreational Release Mortality, I do not support any no targeting closures. I am in support of the following.**

**Sub option C1:** - Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**Sub-option C2:** - Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

**Sub-option D2:** - It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

**As it relates to section 4.4 Rebuilding Plan, I am in support of the following.**

4.4.1 In support of Option B

4.4.2 in support of Option B

4.6.2 in support of Sub-option B1-a

4.6.2 in support of Sub-option C3

4.6.2 in support of Sub-option D2

4.6.2 in support of Sub-option E2

I appreciate your time and consideration.

Thank you,  
Justin H. Gonsalves

**From:** [Korey Paul](#)  
**To:** [Comments](#)  
**Subject:** [External] Comments for amendment 7  
**Date:** Wednesday, April 6, 2022 9:23:36 PM

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My name is Korey Paul and I am an avid surfcaster from the state of Rhode Island. This fishery is much so important and dates back to when I was a child, 30 years of achievements as my knowledge and skill set improved targeting the striped bass. My concerns are to protect this species of any means necessary. If our biologist can prove they are in decline and simply can keep the politics out of fishing then I fully support any means necessary to save this species. Thank you Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment.

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and I hope that my voice will be heard.

Sincerely,

Korey Paul  
Scituate RI, Rhode Island  
Email: [korey.paul@yahoo.com](mailto:korey.paul@yahoo.com)

[Sent from Yahoo Mail on Android](#)

**From:** [William Clark](#)  
**To:** [Comments](#)  
**Cc:** [2022stripercomments@gmail.com](mailto:2022stripercomments@gmail.com)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Wednesday, April 6, 2022 7:56:06 PM

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To the ASMFC -

My name is Will Clark from Massachusetts and I am responding to the request for public comments on Amendment Seven for the management of striped bass.

Here are my choices for each proposed regulation.

4.1

**Tier 1**

A1

B1

C1

**Tier 2**

A2

B1

C1

**Tier 3**

A2

B2

**Tier 4**

A

4.2

B- None

C1, C2

D2

4.4.1

B

4.4.2



B

**4.6.2**

B1-a

C3

D2

E2

Striped Bass are an Immeasurably important part of my experience in the outdoors, and fishing for this incredible species is something I want to be able to share with my kids one day. These fish are worth so much more alive than dead, and we need to take actionable, unified measures to protect their health as a species.

Please stand up for the striped bass, and end overfishing as quickly as possible.  
Please manage stripers for abundance, and not yield!

Thank you,  
Will Clark

**From:** [SAF JR](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass management  
**Date:** Wednesday, April 6, 2022 6:44:36 PM

---

Hello,

My name is Sam French. I have a bachelors degree in fisheries biology from SUNY ESF. I have been fishing on Cape for 3 decades and I've seen the decline, the return, and the now heading for extinction again.

I'm going to make this short because I wanna get to the point. I believe there needs to be a slot limit. Every fishery I have seen that has set up slot limits for fish have resulted in larger populations of fish and larger individuals. For example, walleyes in Canada where I finish every slot limit that you can only keep a certain amount between 40 and 50 cm. We are catching more fish above the slot limit that we are not able to keep than ever before. It has made the recreational fishing incredible. Just because you can not keep a fish under 28 inches does not mean this is the best decision. That means someone can keep one that is 50 pounds or 60 pounds and remove all of that productivity from the system, this is not helpful whatsoever. I believe personally that if you set up a slot limit where you can only keep fish between 28 inches and 32 inches or 34 inches that you would help preserve those large females. Also, tying into that, I know that commercial fisherman rely on fish species to make a living but at what cost? We are going to drive this species into extinction just so fishermen can make a living? That seems very counterintuitive. I personally believe that if we need fish species to eat that we should rely on lesser desirable fish species that taste just as good but have higher numbers available for consumption. That said, I believe that commercial fishing should be discontinued for the next two years to see if that helps the rebound. Absolutely no commercial fishing whatsoever. There also needs to be more consequences for people not following the rules that are currently in place or rules that will be in place after this season. It's one thing to set law but it is another thing to hold people accountable to that law.

These are the only two suggestions that I wanted to throw out there. Create a slot limit and ban recreational fishing for at least a couple of years to give the population a chance to rebound. Allowing commercial fisherman to catch hundreds of thousands of pounds of fish certainly does not help the case of the fish.

I am indeed a recreational fisherman and I practice catch and release best practices, and although there certainly has been mortality from this, however, it is nowhere near as much mortality caused on the fish as environmental stresses and overfishing.

I am glad that this topic is on the table for discussion and I hope everyone takes the best ideas from all of the input and puts them to use.

Thanks in advance,

I can be reached for comment by simply replying to this email.

Sam French.

Sent from my iPhone

**From:** [Nick Kierstead](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Wednesday, April 6, 2022 6:33:05 PM

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Hello-

I am writing to you about Amendment 7, and my concerns that what is being proposed likely won't be enough to save current classes of fish entering the slot limit. From my experiences as a recreational surf and kayak fisher, I believe we need to increase the number of spawning fish by protecting those entering the slot limit for the next few years, at least. I ask that a rolling minimum limit be put in place that increases over the next couple of years to allow the number of spawning bass to recover and ideally, thrive, while fishers get used to participating in the conservation effort.

My second concern is in regards to commercial fishing activity and not including them in the solution. We all have to do our part, or the future of the species will become grim, and ultimately will lead to the demise of their profession and how many can stay in the game. The current approach feels like it is doing the wrong thing for the right reason. Please consider, at minimum, an upper slot limit for commercial fishers for every state involved with the fishery. If the striper is being eaten, no one cares that it was a 'once in a lifetime' catch. In fact, most consumers would prefer to hear they are eating sustainably caught and managed food sources.

More than anything, I encourage you to vote conservatively in favor of the fish. Humans will adapt faster than fish, and we owe at least this much to a species we choose to selectively hunt. It's up to you. If you fall short on this action, we all do.

Thank you for reading my plea.

Sincerely,

Nicholas Kierstead

**From:** [DB](#)  
**To:** [Comments](#)  
**Subject:** [External] Fwd: Comment for Draft Amendment 7  
**Date:** Wednesday, April 6, 2022 5:01:13 PM

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Sent from my iPhone

Begin forwarded message:

**From:** Striped Bass Amendment 7 <amendment7comment@gmail.com>  
**Date:** April 6, 2022 at 3:02:44 PM EDT  
**To:** dannyboydtd@gmail.com  
**Subject:** **Comment for Draft Amendment 7**

My name is Danny Benitto and I am an avid surfcaster from the state of New York. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment. Striped bass have a massive following and create so many jobs for local economies all over the northeast. If the regulations do not make for very serious change, the fishery will be gone. The season is entirely too long and the regulations are too loose and different between states. Conservation equivalency is unacceptable. Save the fish while you can and be a part of the solution for once.

4.1

TIER 1:  
Support A1  
Support B1  
Support C1

TIER 2:  
Support A2  
Support B1  
Support C1

TIER 3:  
Support A2  
Support B2

TIER 4:  
Support A

4.2  
None  
Support C1, C2  
Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and hope that my voice will be heard.

Sincerely,

Danny Benitto

Staten Island, New York

Email: [dannyboydtd@gmail.com](mailto:dannyboydtd@gmail.com)

**From:** [John Nelson](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 6, 2022 4:21:04 PM

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Hello,

I've lived on the Tred Avon River, Talbot Co., Maryland for 17 years and fish throughout the Eastern Shore, Chesapeake Bay and its tributaries almost exclusively for stripers via spinning and flyrod.

The depleted condition of our stripper stock is beyond alarming. On numerous trips in 2021, to very remote but traditional striper hotspots, we were lucky to catch one fish, of any size. These outings included 6-8 hrs. of fishing with experienced/competent anglers.

In September 2021 I was invited on a guided light-tackle charter in the Mid-Bay with three other skilled fishermen. The water was cool, strong tides in our favor with a slight chop, perfect conditions for some striper action. In 6 hrs. with all of us fishing, including the guide, we caught two keeper size speckled trout and zero stripers, of any size. This was with a professional guide that fishes the Mid-Bay every day, except during the worst of January and February weather and hitting every one of his personal go-to hotspots.

For the past few years a number of guides, recreational fishermen and two commercial fishermen have shared their observations, confusion and concerns regarding declining striper numbers.

The numbers of legal and sub-legal fish available have just plummeted in our area. Unfortunately, the Young of the Year (YOY) surveys validate this decline in Maryland's portion of the Chesapeake Bay; while projecting even fewer fish, for years to come. Maryland has never had such low YOY numbers, over three consecutive years, since the survey began in 1954. Maryland's recent YOY survey results are worse than those that preceded the 1985-five year striper moratorium.

I've been here for 17 years, fish the Bay and tributaries weekly, haven't kept a dozen fish in that time and have personally experienced a momentous decline in Maryland's iconic Striped Bass.

Years ago, local striper advocates actually had some influence in Annapolis and at the Federal level. Since then there has been an absence of real, effective influence championing the striper fishery, especially the recreational fisherman.

One Virginia reduction company continues to harvest Menhaden at the mouth of the Chesapeake Bay. This critical forage biomass is a main staple for striper growth, health and survival. And while Virginia has done the right thing by closing their "trophy" striper season; Maryland still promotes the taking of breeder cows each Spring. How very shortsighted and sad.

I would personally advocate for a complete moratorium on any taking of stripers until there is a significant, quantifiable and stable recovery.

Regards,  
John Nelson

**From:** [Timothy Begin](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 6, 2022 3:23:23 PM

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Good Afternoon,

Regarding section 4.2.2 - Measures to Address Recreational Release Mortality – (option B effort controls)  
- please see my comment below.

**Comment:**

I do not support any effort control measures in the recreational fishery. The fact are, that most of the pre and post spawn areas in the Chesapeake bay are already closed, there is no science available that would provide an estimate of how many fish effort control measures would save and effort control measures are almost completely unenforceable.

Catch and release mortality is higher than commercial mortality because the fishery is 90% catch and release. The fishery needs to be managed as a catch and release fishery and managed for abundance rather than maximizing harvest as it is currently managed.

In addition Massachusetts DMF is currently performing a comprehensive study to determine a more accurate catch and release mortality rate. It would not make sense to institute effort control measures before this study is complete.

In closing effort control measures are not enforceable, there is no science to explain how many fish they may save and they appear to be thrust upon the rec community ahead of science that would be very helpful in developing policy in the future. In short effort control measures do not make sense.



**From:** [Robert Giordano](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, April 6, 2022 3:07:31 PM

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Dear Sir/ Madam,

I have been fishing Long Island waters for the past fifty years. In that time, I've witnessed the decline of the Striped Bass, it's protection during the moratorium years, it's rebuild and now the challenges it faces during these times.

As a recreational fisherman who almost exclusively uses fly and light tackle to pursue my interests, an abundant biomass of various year class Striped Bass is paramount to my overall enjoyment during time spent on the water.

I also think of further fisherman and hope we don't put another species so common in our water on the list of other fish that are no longer around in very stable numbers. (Codfish, Winter Flounder, Whiting, Mackerel)

With that said I'd like to offer my support for the following amendment positions:

**4.1 Management Triggers:**

Tier 1: Options A, B and C

Tier 2:Options A, B and C

Tier 3:Options A & B

Tier 4:Option A

**4.2.2 Measures to address Recreational Release Mortality:**

**Option C. Additional Gear Retrictions:**

Option C Sub-Option C1

Option C Sub-Option C2

**Option D. Outreach & Educational**

Option D Sub-Option D2

**4.4.1 Recruitment Assumption for Rebuilding Calculation**

Option B Option B

**4.4.2 Rebuilding Plan Framework**

Option B Option B:

**4.6 2 Management Program Equivalency**

Option B Sub-Option B1-a

Option C Sub-Option C3

Option D Sub-Option D2

Option E Sub-Option E2

I trust you will make a favorable decision when it comes time to pass a vote and thank you for your time concerning this matter.

Sincerely,

Bob Giordano  
210 Bay Ave.  
Huntington, NY 11743  
631-423-6593  
[funbobbydesign@optonline.net](mailto:funbobbydesign@optonline.net)

**From:** [Canal Angler](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Wednesday, April 6, 2022 3:03:46 PM

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Im afraid that those who are trying to implement change for the better are only applying a “band-aid” to the current situation regarding Striped Bass. I think the powers at be know what needs to be done and that is to end the harvesting of Striped Bass completely on all fronts for 10 years or so. No recreational harvest, no commercial harvest.

If release mortality is supposedly at 9% give or take, we can eliminate all other factors contributing to the striped bass stocks by having that (released fish) be the main worry of concern if the stocks keep falling. Obviously there will always be poachers, but lets all agree most of the people fishing out there are the “good guys” who obey the rules. Many fishermen now days have no problem with catch and release fishing for Stripers. Many practice good C&R skills. For those that poach, make it an arrestable offense or make the fines so harsh they won’t be tempted again to do it. But then again why do they keep the fines low? I believe law enforcement wants to keep going back and have small fines to issue. Its just like the war on drugs. They need something to go after. Thats a talk for another day.

But my god, make the fish a game fish/C&R ONLY and see what happens for the next 10 years. Lets see how if it was just C&R, how the stocks do. Surely fishermen arent catching all the Stripers that swim in the sea for the catch and release mortality to take a monumental hit to the stocks?! Make your jobs easier and take out all factors that involve the harvesting of these beautiful fish. I truly believe this will give a better insight into how the stocks currently are and if/how they will recover without having a million different factors contributing to their downfall.

I believe you must act now and try something like this before its too late.

Ive always believed if this approach is taken, the fishing economy for Striped Bass will still stay strong and this is a very important factor.

Its time to stop applying band-aids and seal the wound for good!

-Nick G - Surfcaster from MA

Sent from my iPhone

**From:** [brian.w](#)  
**To:** [Comments](#)  
**Subject:** [External] Comment for Amendment 7  
**Date:** Wednesday, April 6, 2022 1:18:27 PM

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My name is Brian Walters and I am an avid surfcaster from the state of New Jersey. Below are my choices for Amendment 7 (striped bass management) as requested by the ASMFC call for public comment. My name is Brian I have been surf fishing for two years now. I would like to continue to fish for striped bass. I would like this fishery to be responsibly managed. I would also like a commercial ban on striped bass fishing. I would also like the striped bass to become a game fish

4.1

TIER 1:

Support A1

Support B1

Support C1

TIER 2:

Support A2

Support B1

Support C1

TIER 3:

Support A2

Support B2

TIER 4:

Support A

4.2

None

Support C1, C2

Support D2

4.4.1

Support B

4.4.2

Support B

4.6.2

Support B1-a

Support C3

Support D2

Support E2

Thank you for the opportunity to comment, and hope that my voice will be heard.

Sincerely,

Brian Walters  
Beachwood, New Jersey  
Email: [wally891@gmail.com](mailto:wally891@gmail.com)

**From:** [Jeff Farrington](#)  
**To:** [Comments](#)  
**Subject:** [External] Public Comment on stripped bass  
**Date:** Wednesday, April 6, 2022 9:56:16 AM

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I want to state that I want to support whatever measures are needed to reduce the reduction of stock for stripped bass. I feel commercial stock quota needs to be reduced and keep the slot limits and number of fish per day throughout the fishery, meaning all states the same--MA is the model.

Also any form besides rod and reel for harvest of the bass should be prohibited. Last gear should be changed in all states to reduce catch and release mortality. This will drive industry also to create more gear that will increase catch and release survival.

Jeffrey Farrington

*51 Dove Cottage Rd*

*Falmouth MA 02540*

*508-524-5235*

**From:** [Klearko Goro](#)  
**To:** [Comments](#)  
**Cc:** [Emerson Hasbrouck](#); [Maureen Davidson](#); [James Gilmore](#); [CAROL HOFFMAN](#); [Sen. TODD KAMINSKY](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, April 5, 2022 10:21:50 PM

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To the Striped Bass Management Board,

Below are my comments on the draft Amendment 7 for Striped Bass.

My name is Klearko “Klark” Goro, and I am from Mattituck, New York. I will keep the introduction short so that my choices are more visible, before providing some additional thoughts and comments below. I am an avid fisherman, like many others throughout the Northeast and Mid-Atlantic states, and essentially plan my entire year around these beautiful seven-striped fish. At 25 years old, I am younger than many folks who may be reaching out with their comments, but even I remember a time where Striped Bass were prosperous. In fact, such memories and experiences at a young age have shaped me not only as a fisherman, but as a person as well. All throughout the world we are witnessing the effects of not maintaining a healthy give-and-take dynamic with nature and its resources. Amendment 7 is paramount not only because it has the potential to restore the Striped Bass fishery to its past strength, but also because it is an opportunity to set a precedent for other similar situations. It is critical that we do this correctly, and set the tone for managing the future.

Here are my choices:

#### **4.1**

##### **Tier 1**

Option A: Support A1

Option B: Support B1

Option C: Support C1

##### **Tier 2**

Option A: Support A2

Option B: Support B1

Option C: Support C1

##### **Tier 3**

Option A: Support A3

Option B: Support B2

##### **Tier 4**

Support A

#### **4.2**

Option B: Support B2-b

Option C: Support C1, C2

Option D: Support D1

##### **4.4.1**

Support B

#### **4.4.2**

Support B

#### **4.6.2**

Option B: Support B1-a

Option C: Support C3

Option D: Support D3

Option E: Support E2

The choices above were made with the following in mind:

- Overall reduction in mortality, whether it be due to catch-and-release, harvesting, and/or lethal devices
- Unified regulations and quick response times
- Education and outreach

Some further comments:

Although I took the time to ensure that I read and understood draft Amendment 7 to the best of my abilities, there are many who did not or could not due to length and complexity. Organizations such as Strippers Forever, American Saltwater Guides Association, etc. do a good job of trying to spread awareness, however, going forward, there should be an official summary document or video of some sort that presents this complex information in a simplified manner. It is critical for the public engagement that this information is far-reaching and well-understood by all.

Lastly, I would like to discuss the mindset for rebuilding this fishery. We are in a pivotal moment in history, as Striped Bass are right at the center of the Northeast and Mid-Atlantic economies. As such, we need to have as many fish in the ocean as possible to continue and improve on this economic growth. To do so, we MUST manage for abundance rather than yield. This is generally accomplished by fast, high-probability actions and management. Moreover, it is critical that we do not liberalize baselines. As an engineer electric utility industry, I can vouch for the importance of utilizing the most conservative, yet realistic assumptions possible. Decreasing thresholds and triggers will only ever have a negative effect.

Ultimately, I implore the Board to take aggressive action to rebuild the fishery as soon as possible. I understand that this is a high-pressure situation, and that there is internal understanding of the public's fading belief in the ASMFC to erect the situation. However, I believe that in this critical moment is an opportunity to fix the problems and set an example going forward. We must rebuild this fishery within 10 years at all costs.

I sincerely thank you for the opportunity to comment, and I look forward to how to we can save our fishery.

Best Regards,



Klearko Goro  
Mattituck, New York

**From:** [Dave B.](#)  
**To:** [Comments](#)  
**Subject:** [External]  
**Date:** Tuesday, April 5, 2022 8:43:24 PM

---

I FISH A LOT FOR STRIPED BASS, FROM NYC TO MONTAULK PT, IM OUT THERE 3-4 TIMES A WEEK. I DON'T SEE ANY SHORTAGE OF THIS SPECIES OVER THE MANY PASSED YEARS IN THE NY/ NJ ATLANTIC WATERS. NEW JERSEY ALLOWS STRIPED BASS FISHING YEAR ROUND !!! ITS AMAZING OUR BORDERING STATE HAS SO MUCH MORE STRIPED BASS THEN WE DO ! DEFINITLY NOT TRUE ! TO TAKE AWAY OUR RECREATIONAL FISHING AND TOURNAMENTS TO CATCH A BIG STRIPED BASS IS A SHAME ! ALTHOUGH I RELEASE MOST OF THEM MYSELF I MUST SAY I DON'T SEE A SIGNIFICANT DELINE IN THEM TO CUT OFF OR RESTRICT THEM LIKE THIS STATE RECENTLY DID. COMMERCIAL FISHING WAS INCREASED TONAGE FOR WHAT REASON I DON'T KNOW , THEY ARE CREATING ANY SHORTAGE PROBLEMS , NOT US WITH ONLY 1 FISH PER PERSON, MY SUGGESTION IS TO ALLOW NO SIZE LIMIT OVER 30 INCHES AND START THE SEASON AT THE END OF MAY FOR A BETTER SPAWNING TIME. AND REDUCE COMMERCIAL TONAGE .

THANK YOU !

**From:** [Alejandro Oliver](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped bass fishery  
**Date:** Tuesday, April 5, 2022 8:32:08 PM

---

Hello:

It's clear to me that the important stripe bass fishery is under a great deal of stress. I am especially concerned with the massive amount of poaching that I see from both shore as well as on the water. I feel strongly that the management board should make conservation of the species, and rebuilding the population, as the most important objectives. I am onboard with any and all measures that are necessary to achieve those two goals as quickly as possible.

Thank you.  
-Alex Oliver  
Cape Cod, Massachusetts

**From:** [mike connor](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Tuesday, April 5, 2022 8:17:48 PM

---

As a lifelong fisherman, surfer, and water-guy, I totally support all measures required to enhance conservation of the striped bass population, and rebuilding of striper stocks. I personally support any measures required to achieve these vital objectives in the shortest time possible. We're at - no, we've gone over the edge. Striper conservation now!

Thank you,  
Michael Connor  
Boston, MA

**From:** [Kevin Touhey](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped bass  
**Date:** Tuesday, April 5, 2022 8:06:57 PM

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*Greetings,*

*My name is Kevin Touhey. I personally feel that striped bass (along with many species of fish and animals) are under tremendous stress right now. Fishing pressure, development, environmental changes, technology, and many other factors are having detrimental impacts on striped bass and other species.*

*Therefore my recommendation and hope, is that the management board makes conservation of the species, and rebuilding the population, as their most important objectives. I am personally onboard with whatever measures are necessary to achieve those two goals as quickly as possible.*

*Kevin Touhey*

*1 Manor Farm Way*

*Carver, MA 02330*

**From:** [Tom Kelly](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Tuesday, April 5, 2022 6:56:17 PM

---

You brought the stripers back from the brink once before but you let your guard down and now we find ourselves on the edge of another collapse . Please adopt amendment 7 to save this great gamefish . I'm of a certain age that if a collapse like the one that took place in the 1970's and 1980's happens again , I in all likelihood won't be around to see the stripers rebound. Thank You Tom Kelly

Sent from my iPhone

**From:** [Dan Tobin](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, April 5, 2022 6:21:24 PM

---

Dear Atlantic States Marine Fisheries Commission,

I am writing to request that you adopt the measures in Amendment 7 to help the plight of the striped bass. Please adopt measures that ensures that large female stiped bass are not kept by fishermen, especially commercial fishermen. This fish is especially important to the larger economy of coastal areas like where I live on Cape Cod. Without aggressive measures to preserve these larger female fish we will quickly be in a collapse of this fish.

Thank you for your support in protecting the striped bass and I hope ASMFC will take positive action on this important matter.

Sincerely,  
Daniel Tobin  
Harwich, MA

**From:** [Benjamin Brewer](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7 Comments  
**Date:** Tuesday, April 5, 2022 5:48:18 PM

---

Dear ASMFC

My name is Ben Brewer and I am from Connecticut, I am writing this in response to the request for public comment on Amendment 7 for the management of Striped Bass.

We need to act immediately to stop the overfishing of our beloved Striped Bass. We need to manage the species for abundance, not yield. My personal experience has seen drastic reductions in the abundance of these fish in recent years to the point where it is clear we are on a scary downward trend. Please take action immediately to save these wonderful fish.

Below are my choices for each of the proposed regulations, thank you.

#### **4.1**

##### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

##### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

##### **Tier 3**

Option A- Support A3

Option B- Support B2

##### **Tier 4**

Support A

#### **4.2**

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D1

#### **4.4.1**

Support B

#### **4.4.2**

Support B

#### **4.6.2**

Option B- Support B1-a



Option C- Support C3

Option D- Support D3

Option E- Support E2

Thank you very much.

Ben Brewer

**From:** [Captain J Moore](#)  
**To:** [Comments](#)  
**Subject:** [External] Dr. Moore and Draft Amendment 7  
**Date:** Tuesday, April 5, 2022 5:31:18 PM

---

As a Capt., scientist, and resident in possibly one of the states who is most responsible for the death of striped bass I beg you to please consider changing the current lay of the land.

Times change, people change, the environment changes... Let's change with it. Striped bass contribute billions of dollars to the GDP of the United States and directly to the communities, shops, guides, and directly to the enjoyment of millions.

Let's bring our opinions and actions to the current state and get the striped bass population back to plentiful.

Let's reduce mortality to a level that is below the target within one years time as stated in sub option A1.

If that is for some reason unpalatable, let's go to threshold triggers or mortality target triggers. Let's get the striped bass population back to where it needs to be as quickly as possible acknowledging this is a dramatic change from the past and the steps may seem aggressive... They are overdue.

Thank you for your consideration in this matter and please feel free to reach out with any questions.

Capt. Jason Moore PhD.  
970-471-5803  
Island Fly Outfitters  
[www.islandfly.net](http://www.islandfly.net)

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Thanks,

Capt. J. Moore

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**From:** [Bob Triggs](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Ammendment 7  
**Date:** Tuesday, April 5, 2022 5:02:58 PM

---

Dear ASMFC,

I am a lifelong fisherman and boatman. I spent most of my life on the waters of Long Island Sound, the lower Hudson River and adjacent areas. And in the last few decades I have worked as a recreational fishing guide, in New York, New England, Alaska, Kamchatka Russia and the Pacific northwest.

I have fished for striped bass in most of their native waters, from New England to Georgia. I have seen the striped bass populations boom and bust repeatedly, in my 66 years of fishing. It saddens me that we aren't doing more for these wild fish, while we still have a chance to make a positive difference for them. We humans seem to learn things the hard way.

I am deeply concerned about the management and exploitation of wild striped bass today. I am requesting that ASMFC take strong steps to further protect striped bass in every age class. I do not believe that we should be fishing for them in their spawning season. And we certainly should not be harvesting them prior to their spawning age. We should be protecting them from fishing, of any kind, until they have had more time to mature as spawners. We should not be harvesting them throughout their viable spawning years. Nowhere should there be "year round fishing" for striped bass. We've gone too far in harvesting these wild fish. Commercial fishing for striped bass should be limited to freshwater artificial fisheries, in impoundments, lakes, reservoirs, etc. No wild striped bass should be subject to Commercial fishing and harvesting.

Not enough is being done to better manage wild striped bass habitats, and their forage species. We need to do more to conserve, restore and protect these habitats.

Please reduce harvest of striped bass in all waters that you possibly can do so. No one will starve to death if we stop killing striped bass for some years. And if we reopen harvest of those fish, if they are recovering sufficiently, we need to limit harvest strictly to protect a wider range of age classes.

The party is over. Stop killing striped bass. It's long overdue.

In my lifetime of striper fishing I have never been checked by a state or federal wildlife officer, game warden, etc. Never in 66 years of striper fishing. Enforcement is a key to management. Please expand enforcement of fisheries laws.

Sincerely,  
Bob Triggs

**From:** [Billy Cody](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, April 5, 2022 4:57:08 PM

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Dear Council,

I am writing to comment on Striped Bass Amendment 7. I remember as a kid catching striped bass in New England in the late 1990s heyday after their remarkable recovery. Having recently returned to fishing and now living in Northern Virginia, I've begun targeting them again, this time with a fly rod along the shores of the Potomac. But having followed the reports about their rapidly declining numbers, I'm alarmed that this amazing, world-renowned striped bass fishery is on the verge of irrecoverable loss. I have five sons and cherish the hope to share recreational, responsible catch-and-release striped bass fishing with them. But I am extremely worried I won't be able to enjoy that with them and disappointed that the ASMFC inaction has brought the striped bass population to this point.

We are stewards of the earth and all the creatures in it. If we wish to continue enjoying and for many earning a living off the Chesapeake's striped bass fishery, then action must be taken now to save them.

Below I have listed which options in Amendment 7 I support. Thank you for listening to the voice of the anglers who love and care about this fishery.

#### 4.1 Management Triggers

Tier 1:

- Option A: **I support Sub-Option A1**
- Option B: **I support Sub-Option B1**
- Option C: **I support Sub-Option C1**

Tier 2:

- Option A: **I support Sub-Option A2**
- Option B: **I support Sub-Option B1**
- Option C: **I support Sub-Option C1**

Tier 3:

- Option A: **I support Sub-Option A2**
- Option B: **I support Sub-Option B2**

Tier 4:

- **I support Option A:** The council has already delayed far too long. Any further delays would be an embarrassment and risk the future of the fishery.

#### 4.2.2 Measures to Address Recreational Release Mortality

- Option C: **I support Sub-Option C1**
- Option C: **I support Sub-Option C2**
- Option D: **I support Sub-Option D2**

#### 4.4 Rebuilding Plan

- **I support Option B** rebuilding under a low recruitment regime

#### 4.4.2 Rebuilding Plan Framework

- **I support Option B**

#### 4.6.2 Management Program Equivalency

- Option B: **I support Sub-Option B1-a**
- Option C: **I support Sub-Option C3**
- Option D: **I support Sub-Option D2**
- Option E: **I support Sub-Option E2**

Sincerely,  
Billy Cody  
Alexandria, VA

**From:** [Blane chocklett](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Tuesday, April 5, 2022 3:49:35 PM

---

Amendment 7

Please save the Stripers, it's time to fix the problem. Let's protect America's fish, it's the fish our country was founded on and it should be respected like the bald Eagle before it's too late.

Thank you for your time

All the best

Blane Chocklett

Sent from my iPhone

**From:** [Michael Lyons](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, April 5, 2022 3:47:20 PM

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

Dear Ms. Franke and members of the ASMFC Atlantic Striped Bass Management Board (Board),

I am writing to you from literally just minutes down the road from your office in Arlington, VA. I spend countless hours on the Potomac River in DC, fishing for striped bass. I pass near your building on my way up the Potomac River to the best fishing grounds, just northeast of Rosslyn, VA. I also fish for striped bass on the Bay. Over the years, the striped bass fishery has gone from bad to worse. There are some days where we are lucky to see one fish. I know from experience that there are still some big breeder fish out there and that gives me hope. These fish face incredible odds, making it up the freshwater rivers of the east coast. And we need to do all we can to make sure this is not the last decade that this happens. These fish are worth so much more to us alive than dead. If I had to add up all of the dollars I spend each year on travel, guides, tackle and marina fees, just to name a few of the expenses, the value would be in the thousands of dollars. And I am just one anger of many. The economic impact of these fish is great. But if the fishery continues to lose its fish, the US economy will suffer and many of the people that make a living on the water will no longer be able to do so.

By submission of this letter or comment, I am voicing my support in favor of maintaining the status quo for the spawning stock biomass and fishing mortality triggers contained in the striped bass management plan. By any measure of common sense, one would expect immediate action, given that the most recent young-of-the-year indices clearly show the stock is in deep trouble. Any and all actions should be done immediately, and within one year or less. We don't have time to delay action at all. For Tier 2, The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

As for recreational mortality, we should do everything within reason to support low mortality, including public outreach and education. I do not support intermittent and state/time specific closures within a season. These closures are inexact and serve to alienate the fishing public. We should be able to build a healthy stock based on science and more exact policy. As an example, closing the Bay during the month of April while allowing people to fish for these fish during many of the Summer months does not make any sense. Fish released in April in cold water are much better off than any fish released in the Summer. If closures are needed, that sounds like an admission that the stock is in trouble. And if it is, we should find ways to improve the stock on a long term basis and

not a week by week, band-aid style approach.

For 4.6.2 Management Program Equivalency, some of the ideas proposed in Amendment 7 should be implemented in a way that does not allow certain states to take advantage of the process. CE programs should not be allowed under any circumstances as long as the biomass is considered overfished in any way, shape or form. States should not be able to use MRIP estimates to make any changes to their understanding of CE. I support a 25% Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries. We must err on the side of caution. I also support Proposed CE programs which would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state-specific level. Each state is different when it comes to habitat, population and a host of other factors that help or hurt striped bass stocks, and therefore it is common sense to expect that some states will need to do more than others to get to a favorable outcome for the species.

Thanks for your time and work on this very important fishery.

Respectfully,

Michael Lyons  
Business Development Manager  
The Rowman & Littlefield Publishing Group, Inc.  
National Book Network  
4501 Forbes Blvd, Suite 200  
Lanham, MD 20706  
Phone: (301) 459-3366 ext. 5531  
Cell: (301) 602-1323  
Email: [mlyons@rowman.com](mailto:mlyons@rowman.com)



**From:** [Colin Miller](#)  
**To:** [Comments](#)  
**Subject:** [External] Public Comment (Hudson River)  
**Date:** Tuesday, April 5, 2022 2:54:46 PM

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Hello, My name is Colin Miller I live in Kingston, NY along the Hudson River. I am a graduate of fisheries and wildlife science at SUNY Cobleskill. I am writing to voice my opinion and experience on striped bass fishing on the Hudson River. I have been striper fishing for about 15 years on the Hudson. Over those years I have seen a gradual increase in the size of striped bass and the quality. One thing I have noticed that is alarming is the little presence of law enforcement on the river. In my 15 years of fishing on the Hudson from Kingston to Catskill I have never once been checked by an environmental law officer. I am not just a weekend warrior, for the few short weeks we have to fish I am on the river every chance I get. I have seen biologists electro fishing for herring and striper, but that is all. I believe if there was a greater presence of officers on the river not only patrolling, but educating the public it would go a long way. Sadly, some fisherman are not honest and need to learn the hard way. I personally am a catch and release fisherman when it comes to striped bass. But for the outlaws and the people who are not, it would definitely make them think twice before they act. The Hudson valley is a beautiful place where with each different season it brings an exciting new adventure for the outdoorsman. From hiking mountains in the Catskills searching for an old mountain buck, fishing for trout in tributaries, to chasing turkeys and stripers in the spring. This past season (2021) I had my best season fishing and had countless healthy 40"+ fish. I would hate to see even the 2 week closure for the "spawning period." Many anglers would just not fish anymore it would ruin our short time frame to catch a fish of a lifetime. If anything please consider the option for catch and release only, education and outreach. A greater law enforcement presence will go a long way and be appreciated by many law abiding sportsman like me who want to see these fish thrive for generations to come.

Thank you  
- Colin Miller  
Sent from my iPhone

**From:** [Dave Mowles](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, April 5, 2022 11:17:40 AM

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Good Morning,

As many other anglers and conservationists have already indicated, we need to address the current state of the Atlantic Striped Bass fishery and its future health. Ultimately I would like to see the fishery restored to its prowess of the late 90's and early 2000's with the intent of remaining that way for the foreseeable future. To prevent a steep decline in breeding stocks, I do believe (like many anglers do) that management triggers should be at a reasonable threshold and structured with the intent of action upon those triggers being met.

To accomplish these goals, I urge the Board to include the following options in Amendment 7:

4.1 Management Triggers

Tier 1 - A1, B1, C1

Tier 2 - A2, B1, C2

Tier 3 - A2, B2

Tier 4 - A

4.2.2 Recreational Release Mortality

Sub-Options C1, C2, D2

4.4 Rebuilding Plan

4.4.1 Option B

4.4.2 Option B

4.6.2 Management Program Equivalency

Sub-options B1-a, C3, D2, E2

Dave Mowles

845 North Street, Randolph MA 02368

**From:** [Nick Neverisky](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7 - support for whatever it takes to secure the population in the long term  
**Date:** Tuesday, April 5, 2022 9:07:01 AM

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I'm writing to support whatever actions are necessary to support a healthy population of striped bass in the long term. I fish and enjoy doing so, but I have no objection to changing, reducing, or pausing my fishing for a certain species/population if doing so will safeguard the resource. Our management of ecosystems needs to take the long view.

Nick

**From:** [Andy Billipp](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, April 5, 2022 7:39:10 AM

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Hello, I'm writing today to voice my support for regulation changes that will allow recovery of striped bass. I live in CT and fish with my father and two little kids. My dad has been fishing in this area long enough to remember when there were almost no fish to be found, and is now broken hearted to see them decline again. My kids, 6 and 7, have each caught some schoolies, and talk often of when they'll finally catch a keeper. Please do whatever is needed to make their bass fishing future as bright as it can be.

If we have to give up keeping stripers for a period of time, please make sure the commercial seasons are likewise limited, if not removed altogether. The impact of the loss of this fishery on the local economies in fishing towns up and down the coast would doubtless be greater than the impact on the commercial fleet.

Thanks for your time,  
Andy Billipp  
Newington, CT



Sent from my iPhone

**From:** [Brendan Mulcahy](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, April 5, 2022 7:02:30 AM

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Hello,

I'm a lifelong resident of the Northeast, spending my time fishing for Striped Bass in Massachusetts, New Hampshire, and Maine. I currently live in Massachusetts, work in New Hampshire, and own property in Maine. I'm currently a licensed hunting Guide in New Hampshire, and pursuing my fishing guide's license as well.

I am upset at the state of our fishery, and the inaction I've seen from the committee in the past, so am writing to voice my priorities and perspectives on Draft Amendment 7. Primarily, I am worried about long term sustainability and populations, and feel action needs to be taken NOW to recover Striped Bass to target levels.

I appreciate that this is a complex issue, but will be doing my part to hold the committee accountable for taking action now.

Thank you for your time,

Brendan Mulcahy

Medford, MA (Home)  
Hampton, NH (Work)  
Harpwell, ME (Property Owner)

\*\*\*\*\*

## **4.1 - Management Triggers**

### **Tier 1 Options - Fishing Mortality (F) Triggers**

My priorities, please include:

- Sub-Option A1
- Sub-Option B1
- Sub-Option C1

### **Tier 2 Options - Female Spawning Stock Biomass (SSB) Management Triggers**

My priorities, please include:

- Sub-Option A2
- Sub-Option B1
- Sub-Option C2

### **Tier 3 Options - Recruitment Triggers**

My priorities, please include:

- Sub-Option A2
- Sub-Option B2

#### **Tier 4 Options – Deferred Management Action**

My priorities, please include:

- Option A

***I don't support any option that allows responding to triggers to be ignored, deferred, or delayed.***

#### **4.2.2 Measures to Address Recreational Release Mortality**

My priorities, please include:

- Sub-Option C1
- Sub-Option C2
- Sub-Option D2

***I don't support any option that allows responding to triggers to be ignored, deferred, or delayed.***

#### **4.4 Rebuilding Plan**

##### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

My priorities, please include:

- Option B

***There is no formal rebuilding plan now. Please include option B!***

##### **4.4.2 Rebuilding Plan Framework**

**My priorities, please include:**

- Option B

##### **4.6.2 Management Program Equivalency**

**My priorities, please include:**

- Sub-option B1-a
- Sub-option C3
- Sub-option D2
- Sub-option E2

From: [John Franzen](#)  
To: [Comments](#)  
Cc: [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
Subject: [External] Striped Bass Reg's  
Date: Monday, April 4, 2022 7:26:21 PM

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To Whom it May Concern,

As a transplanted midwesterner (trout fisherman) Striped Bass added another dimension to my angling when I moved to New England 47 years ago.

Back then they were much scarcer than now- so much so that it took over a year for me to catch my first one. I also lived through the incredible recovery that took place in the early 1990's. So I know the potential for this fishery under the right circumstances.

Below are the specifics of what I'd like to see in the management plan.

Thanks!

John P. Franzen  
2760 Congress St.  
Fairfield, CT 068242

On 4.1 Management Triggers, I support:

Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality

Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold

Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions

Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, I support:

Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method

Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, I support:

Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. We recognize this option may require more restrictive management measures than option A, which we support

On 4.4.2 Rebuilding Plan Framework, I support:

Option B to allow the Board to take direct management actions as well as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, "Management



program equivalency (also known as “conservation equivalency” or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

I believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically, I support:

Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level

Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates

Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries

Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

**From:** [Dave Prockop](#)  
**To:** [Comments](#)  
**Subject:** [External] Comment on Amendment 7  
**Date:** Monday, April 4, 2022 4:05:58 PM

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Dear ASMFC,

I appreciate your careful consideration of how best to manage our striped bass population. Like many recreational anglers, I am deeply concerned about the declines we are already seeing as well as the potential for much worse in the future. That is why I have taken the time to read a great deal about Amendment 7.

On your remaining issues, please register my heartfelt support for the options listed below.

With thanks for your time and consideration,

Dave Prockop  
Providence, RI

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I SUPPORT:

4.1

Tier 1: Sub-Options A1, B1, and C1

Tier 2: Sub-Options A2, B1, and C1

Tier 3: Sub-Options A2 and B2

Tier 4: Option A

4.2.2

Sub-Options C1, C2, and D2

4.4.1

Option B

4.4.2

Option B

4.6.2

Sub-Options B1, C3, D2, and E2 (All other plans seem almost pointless if these sub-options are not included!)

**From:** [Jeff Popp](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Monday, April 4, 2022 2:35:33 PM

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#1 require all anglers to buy a license . No more boat license. Let's know real numbers of recreational anglers

**From:** [10-4 Partners](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass  
**Date:** Monday, April 4, 2022 1:04:05 PM

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Hi there,

Having lived and fished through the last downturn of the stocks roughly 40 years ago, I was waiting for fisheries management to come to the rescue. The same scenario was playing out as years ago: there were some really big fish and a lot of smaller fish (the 1982 year class of stripers). Back then, management protected the 1982 year class of fish by raising the legal minimum limit you could keep a striped bass, each year successively raising the limit as that year class grew. The minimum length started at 28" and went all the way to 36." In New York waters in 1986 there was a moratorium for one year, originally the closure was due to high levels of PCBs, but was seen as a crucial step in the recovery process of the striper. Even commercial fishing was curtailed.

These management strategies were extremely effective and we returned to keeping one fish at 28" minimum to expanding to two fish at 28" in later years. These actions resulted in a vibrant fishery until 2012. Presently, as the stocks have declined, management has been slow to respond. They reduced the "retain limit" back to one fish, but this has had little or no effect on overall bass stocks.

So, we have a successful blueprint from 40 years ago and we are now, similarly, seeing a lot of smaller fish from the 2015, 2017 and 2018 year class. To which your response is a slot limit instead of a minimum limit that would increase as those year classes matured. Now those year classes are entering the slot and will be targeted and not protected. I feel a valuable resource – the pool of 2015, 2017 and 2018 fish – is being wasted. Your slot proposal targets these fish as they become active spawners. I recommend a minimum limit that increases annually as these year classes mature.

My second concern is the lack of any reduced take on the part of commercial fisherman. You don't deem this group as a problem, but I believe they are a problem nonetheless, given the size of this sector and their methods of fishing. Are you able to calculate the catch and release mortality of commercial fishermen? I would love to understand your rationale for this decision beyond 'commercial fishing will not be addressed.' Without your rationale I am left feeling that there may be political motivations involved that favor the commercial sector. While this may be good for commercial fishermen, it is not good as a comprehensive solution to shrinking stocks of striped bass.

Also, unknown to many fishermen, there is no upper slot for commercial fisherman at least in Massachusetts. If they catch a fifty pound fish in Mass they can keep and sell that fifty pound fish. How is the slot limit protecting the fish in this instance?

With the stocks in trouble, we all need to suffer a little to spur a robust recovery. The commercial guys should not be getting a free ride. I know my perspectives presented here are not part of Amendment 7, and are not currently being discussed, but they should be if we are going to recover and rebuild the stock in a reasonable time frame.

Thank you,

John

--

Ten-Four Partners  
Harrison, New York  
(914) 262-5506

**From:** [Matt](#)  
**To:** [Comments](#)  
**Subject:** [External] Please the right thing for the striped bass  
**Date:** Monday, April 4, 2022 1:02:23 PM

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To Whom It May Concern:

My name is Gary R. Soldati and I am a plug maker and serious surfcaster. I would like to share with you my experience and recommendations for the recovery of the striped bass stocks.

In spring, 2012, on my annual week-long trip to Block Island, I noticed a significant decline in the fish landed during our trip. I chalked it up to a bad week of fishing. When this same scenario happened on subsequent yearly trips, I realized fishermen had a big problem. I was not the only one to experience this downturn in the stocks. Fishermen all along the Atlantic Coast buy plugs from me and they were experiencing the same poor fishing.

Having lived and fished through the last downturn of the stocks roughly 40 years ago, I was waiting for fisheries management to come to the rescue. The same scenario was playing out as years ago: there were some really big fish and a lot of smaller fish (the 1982 year class of stripers). Back then, management protected the 1982 year class of fish by raising the legal minimum limit you could keep a striped bass, each year successively raising the limit as that year class grew. The minimum length started at 28" and went all the way to 36." In New York waters in 1986 there was a moratorium for one year, originally the closure was due to high levels of PCBs, but was seen as a crucial step in the recovery process of the striper. Even commercial fishing was curtailed.

These management strategies were extremely effective and we returned to keeping one fish at 28" minimum to expanding to two fish at 28" in later years. These actions resulted in a vibrant fishery until 2012. Presently, as the stocks have declined, management has been slow to respond. They reduced the "retain limit" back to one fish, but this has had little or no effect on overall bass stocks.

So, we have a successful blueprint from 40 years ago and we are now, similarly, seeing a lot of smaller fish from the 2015, 2017 and 2018 year class. To which your response is a slot limit instead of a minimum limit that would increase as those year classes matured. Now those year classes are entering the slot and will be targeted and not protected. I feel a valuable resource – the pool of 2015, 2017 and 2018 fish – is being wasted. Your slot proposal targets these fish as they become active spawners. I recommend a minimum limit that increases annually as these year classes mature.

My second concern is the lack of any reduced take on the part of commercial fisherman. You don't deem this group as a problem, but I believe they are a problem nonetheless, given the size of this sector and their methods of fishing. Are you able to calculate the catch and release mortality of commercial fishermen? I would love to understand your rationale for this decision beyond 'commercial fishing will not be addressed.' Without your rationale I am left feeling that there may be political motivations involved that favor the commercial sector. While this may be good for commercial fishermen, it is not good as a comprehensive solution to shrinking stocks of striped bass.

Also, unknown to many fishermen, there is no upper slot for commercial fisherman at least in Massachusetts. If they catch a fifty pound fish in Mass they can keep and sell that fifty pound fish. How is the slot limit protecting the fish in this instance?

With the stocks in trouble, we all need to suffer a little to spur a robust recovery. The commercial guys should not be getting a free ride. I know my perspectives presented here are not part of Amendment 7, and are not currently being

discussed, but they should be if we are going to recover and rebuild the stock in a reasonable time frame.

Thank you,

Matt Handelsman

**From:** [nicholas favata](#)  
**To:** [Comments](#)  
**Subject:** [External] AMENDMENT 7  
**Date:** Monday, April 4, 2022 12:56:06 PM

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Hi,

My name is Nick Favata, I am an avid surf caster and striper fisherman from the state of New Jersey. My family has been fishing for striped bass for four generations before me and we have loved and enjoyed every minute with these amazing fish. At this time however, I am worried that future generations will not have the opportunity and privilege to continue to chase striped bass in the northeast like my father has, my grand father, and my great grandfather. We must act now to protect this fish in order to ensure a thriving fishery without the fear of endangerment. These fish are the core of our fishery in the northeast and deserve to be held to the highest standard of protection and preservation. Please pass amendment 7 to protect the livelihood and pastime of our great striped bass.

Best regards,  
Nicholas Favata

Sent from my iPhone



**From:** [Walter Kay](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7 Comments (Striped Bass)  
**Date:** Monday, April 4, 2022 10:28:45 AM

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To the commission

My name is **Walter Kay**, and I am reaching out to publicly comment on the proposed Amendment 7 to the Atlantic Striped Bass Interstate Fishery Management Plan (FMP), as defined in the Atlantic States Marine Fisheries Commission Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass.

I live in Newport, Rhode Island and am an avid recreational fisherman. I am also an active participant with the Rhode Island Saltwater Anglers Association (RISSA). I am passionate about sustainable fish conservation and actively participate on RISAA committees as a steward of fishing conservation and safety. With that being said, **I care deeply for the conservation and sustainability of our striped bass fishery**. I practice catch and release of all the Striped Bass that I catch and hope to enjoy sustainable fishing for years to come.

After reviewing Amendment 7 of the FMP, here are my personal choices:

#### **4.1**

##### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

##### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

##### **Tier 3**

Option A- Support A3

Option B- Support B2

##### **Tier 4**

Support A

#### **4.2**

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D1

**4.4.1**

Support B

**4.4.2**

Support B

**4.6.2**

Option B- Support B1-a

Option C- Support C3

Option D- Support D3

Option E- Support E2

I also want to express my personal thoughts regarding Amendment 7. I found it to be overly complicated, which made it hard for me to easily understand and support. I must reiterate, even though I am passionate about the subject, I unfortunately found the complexities of Amendment 7 to be off-putting. I would hope that, as a lesson learned, in the future there would be a summary document available that is easy enough for the average person to read and comprehend. This would allow for maximum participation in support of such a critical amendment.

In closing, I sincerely thank you for the opportunity to hear my choices to Amendment 7, as well as my personal feedback. I hope that my voice will be heard toward the establishment of a sustainable fishery.

Walter Kay

Newport, Rhode Island 02840

**From:** [Jeffrey Campbell](#)  
**To:** [Comments](#)  
**Subject:** [External] FW: Striped Bass Regulations  
**Date:** Monday, April 4, 2022 8:08:41 AM

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Hello-

I am a recreational fisherman and believe like many do that the Striped Bass fishery is under stress. I am in favor of what ever means you deem necessary to help the fish to recover.

Any periodic moratoriums on retaining fish should extend to the commercial fleet as well. I am strictly catch & release but over the last two years I can count on one hand the number of slot size fish I've caught.

Enforcement needs to be stepped up as it seems there is almost nothing being done. Violators have little fear of being caught and less of the consequences.

A lot of us are quiet but we appreciate your work.

**Jeffrey Campbell**  
**Chatham, MA**  
[jeff@seaboarldrilling.com](mailto:jeff@seaboarldrilling.com)

**From:** [David DeCaprio](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Sunday, April 3, 2022 2:07:01 PM

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To FMP Coordinator Emilie Frankie

My name is David DeCaprio from Guilford Ct. I have been a registered recreational fisherman in CT for over 45 years. The upcoming striped bass Draft Amendment 7 vote concerns me and I would like you to consider my opinion.

I will list my sub-option preferences below

Tier 1

- Option A: Sub-Option A-1
- Option B: Sub-Option B-1
- Option C: Sub-Option C-1

Tier 2

- Option A: Sub-Option A-2
- Option B: Sub-Option B-1
- Option C: Sub-Option C-1

Tier 3

- Option A: Sub-Option A-2
- Option B: Sub-Option B-2

Tier 4

- Option B: Sub-Option B-1-a
- Option C: Sub-Option C-3
- Option D: Sub-Option D-2
- Option E: Sub-Option E-2

Please consider my preferences for the stripe bass fishery. They need protective policies in place. Thank-you.

David DeCaprio

Sent from my iPhone

**From:** [Melanie DeCaprio](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Sunday, April 3, 2022 1:41:21 PM

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To FMP Coordinator Emilie Franke

I am a Connecticut fisherwoman and would like reach out to you my supportive choices for the upcoming amendment vote regarding the striped bass fishery. I will list out for your administration my preferred choice of options for the Draft Amendment 7

Vote. Striped Bass are vulnerable and over fished and need prompt oversight as well as responsible protective policies in place to allow the fishery to continue to thrive for years to come.

Tier 1

I favor Option A: Sub-option A-1

I favor Option B: Sub-option B-1

I favor Option C: Sub-option C-1

Tier 2

I favor Option A: Sub-option A-2

I favor Option B: Sub-option B-1

I favor Option C: Sub-option C-1

Tier 3

I favor Option A: Sub-option A-2

I favor Option B: Sub-option B-2

Tier 4

I favor Option B: Sub-option B-1 (a)

I favor Option C: Sub-option C-3

I favor Option D: Sub-option D-2

I favor Option E: Sub-option E-2

I hope you seriously consider my preferences as a CT fisherwoman for years to come.

Thank-you for your attention.

Melanie DeCaprio  
Guilford, CT

**From:** [Robert Scanlon](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Sunday, April 3, 2022 10:09:47 AM

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The ASMFC

I want to submit my comments on amendment 7. Let me preface by saying that your management actions should be swift and comprehensive to rebuild current stock levels.

I come from a fisheries management background and now I am focused as a sport angler. I have released all my Striped Bass catches for many years, finding it more enjoyable to find and catch than to keep.

Your actions can help preserve this species not just for me but for future generations as well. Please see my recommendations below.

Sincere regards,  
Robert W. Scanlon, Jr.  
Newbury, MA 01951

4.1 Management triggers:

**Tier 1 Options:** Fishing Mortality (F) Management triggers (page 45 and 46)

**Sub-option A1**

**Sub-option B1**

**Sub-option C1**

**Tier 2 Options:** Female Spawning Stock Biomass (SSB) Management triggers (page 47)

**Sub-options A2**

**Sub-option B1**

**Sub-option C1**

**Tier 3 Options:** Recruitment Triggers (page 48-52)

**Sub-option A3**

**Sub-option B2**

**Tier 4 Options:** Deferred Management Actions (53 and 54)

**Option A**

4.2.2 Measures to Address Recreational Release Mortality

**Option A** (see page 58 for details)

One of the issues noted with required use of circle hooks it is hard to

enforce since someone using J hooks could just say they are fishing for blue fish. A suggestion would be to require circle hooks for all species regulated by ASMFC, at least above a certain hook size.

**Sub-option B1-a** but changing it to say no harvesting rather than targeting. This would be very difficult to enforce if targeting is used. Should get much of the expected results if harvesting is used. (page 60)

**B2-a**

**Sub-option C1** (page 64)

**Sub-option C2**

**Sub-option D1** (pages 64 and 65)

4.3.2.1 Commercial Quota Transfers (page 66)

Recommend current practice of no transfer.

4.4.1 Recruitment Assumption for Rebuilding Calculation (page 67 and 68)

**Option B**

4.4.2 Rebuilding Plan Framework (page 69)

**Option B**

4.6.2 Management Program Equivalency (pages 76-79)

**Sub-option B1-a**

**Sub-option B1-c**

**Sub-option B2-a**

**Sub-option B2-b**

**Sub-option C3**

**Sub-option D3**

**Sub-option E2**

**Thank you.**

**From:** [Jared Makowski](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment 7  
**Date:** Sunday, April 3, 2022 6:27:36 AM

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Hi Emily. As a new fishing season starts I hope that you and the board are considering doing what's best for the striped bass. It would be a shame to have such a beautiful species go extinct on your watch. I would hope that in your life you have been passionate. It is this great passion that allows us as individuals to break free from our stress filled lives and achieve a relaxed state of mind. I speak for thousands who feel this passion towards striped bass. If we continue to overharvest and destroy this magnificent species it will be a travesty. I sincerely hope that you take a stronger stance on protecting the striped bass. There are far too many individuals out there that disrespect our natural world and care nothing of the future. We need you to be our champion. Thank you for your time and god bless.

-Jared Makowski



**From:** [skipperpaul425@yahoo.com](mailto:skipperpaul425@yahoo.com)  
**To:** [Comments](#)  
**Subject:** [External] Comments/Amendment 7  
**Date:** Saturday, April 2, 2022 12:00:41 PM

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The measures that you've been having the last ten years have done nothing to bring back the striped bass population at all, maybe time to put a few real fishermen on the board not non fishing people and commercial fishing people. The slot measure in lot of states doesn't apply to commercial fishing, WHY is that?

Sent from my iPad

**From:** [Brad Curtin](#)  
**To:** [Comments](#)  
**Cc:** [2022stripercomments@gmail.com](mailto:2022stripercomments@gmail.com)  
**Subject:** [External] Striped bass amendment 7 comments  
**Date:** Saturday, April 2, 2022 8:54:00 AM

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To the Atlantic States Marine Fisheries Commission

These are my comments on the proposed amendment 7 of the management plan for the Atlantic striped bass fishery.

My name is Brad Curtin from Massachusetts and I am an avid recreational fisherman who cares deeply for the striped bass fishery. Before I comment specifically on the individual points of the amendment 7 document I would like to make a few comments and recommendations in regards to the amendment 7 document and the Atlantic striped bass management in general. (I have put my specific comments to each individual question\tier at the end of this email)

I found the pid for amendment 7 to be excessively and unnecessarily complex for the average member of the general public to read, interpret, and provide comment on. I know for a fact, as I have heard from multiple anglers who I know personally that they felt there was too much info for them to read through and understand in a way that they felt comfortable enough to make a comment on it even though they do care about the state of the fishery and are concerned by the current state. I am only comfortable enough to write this email after reading multiple reports on the pid from different conservation groups and talking with several other like minded anglers to gather as much information as possible without needing to sift through all 180 pages the commision published. I hope I am mistaken in my thinking that perhaps the commission may have intentionally published such a long and complex document in order to dissuade from engaging and commenting on amendment 7. Hopefully this is not the case and in the future more care is taken to ensure the documents intended for general public consumption and comment will be written in a way that the public can quickly and easily read, understand, and provide comment on.

In the past the ASMFC has acknowledged that the public is losing faith in their ability to quickly and effectively make decisions based on current data and the desires of the public in response to said data. So please act as quickly as possible based on the current state of the fishery and the majority of the public's wishes lest our fishery suffers more, and the public's opinion of you suffers more and faith in the commision is lost completely.

My overall opinion for the management of the fishery is to manage to the point of abundance, not just yield. I'm sure you are able to recognize that the majority of the striped bass fishery consists of recreation, catch and release anglers. As such that is where the largest amount of money generated by the fishery including tourism and related retail profits comes from. So it is understandable that the more fish in the ocean the better it is for everyone, the economy, the anglers, and of course the state of the fishery and the greater the potential for its lasting and thriving future.

I feel some of the actions taken in the past by the commision did not have high chances of success over long periods of time. I believe we need more aggressive measures taken that will be able to protect and rebuild the fishery as fast as we possibly can. I prefer management that aims to keep "too many" fish in the ocean and responds aggressively to critical threshold and

trigger data and takes greater effort on a year to year basis in preventing the triggers from tripping rather than waiting for triggers to trip before action is taken and we see the fishery fall into a state like the current status or worse. As such I am completely opposed to any suggested measures that would lower or shift current baselines. We have managed the fishery well in the past based on these baselines and we should never consider decreasing our population targets (SSB thresholds and triggers).

As there is currently no data that suggests closing spawning grounds to both harvesting and targeting striped bass would lead to an increase in the population (SSB or YOY) I cannot say I am in favor of taking these actions. However if data is found that can prove it would I would absolutely be in favor of these measures and potentially even longer periods of closure if it would help further. That and law enforcement have already deemed these measures "unenforceable". For those reasons I do not support 4.2 option B. Again however I would be in favor of closures if these concerns were addressed.

Above all, I ask the commission to act quickly and aggressively with abundance not yield at the priority of their decisions for the management of the striped bass fishery. We MUST rebuild the fishery in less than 10 years and at all costs, by any measures deemed effective by science. This can only be accomplished by immediate action by the ASMFC and state marine fishery commissions.

I am in total opposition to the use of conservation equivalency (CE). I feel and also know the commission recognizes CE allows for too much gray area in the management on a state to state level, and as such some states may be influenced to use CE to skate around some of the regulations put in place by the commissions. The fact that the ASMFC not only recognizes this but also acknowledges the risk of using CE potentially poses and yet continues to propose options for CE as opposed to completely removing CE from the management plans is completely baffling to me. I really hope no CE options remain as part of the management plans going forward after amendment 7 is implemented.

Thank you for the opportunity to comment on this document, I hope my voice and desires for the future of this beloved and important fishery will be acknowledged and we will do all we can to save the striped bass and restore their population to never before seen numbers.

My comments on each specific question/tier and option of amendment 7:

#### 4.1

##### **Tier 1**

Option A- I support A1

Option B- I support B1

Option C- I support C1

##### **Tier 2**

Option A- I support A2

Option B- I support B1

Option C- I support C1

##### **Tier 3**

Option A- I support A3

Option B- I support B2

**Tier 4**

I support A

**4.2**

Option B- I support no measure

Option C- I support C1, C2

Option D- I support D1

**4.4.1**

I support B

**4.4.2**

I support B

**4.6.2**

Option B- I support B1-a

Option C- I support C3

Option D- I support D3

Option E- I support E2

Sincerely,

Brad Curtin

Wareham, Massachusetts

**From:** [Kurt Karwacky](#)  
**To:** [Comments](#)  
**Cc:** [2022stripercomments@gmail.com](mailto:2022stripercomments@gmail.com); [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Striped Bass Draft Amendment 7 Comments  
**Date:** Friday, April 1, 2022 8:40:51 PM

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ASMFC Commissioners and staff,

I am writing to provide my comments and positions on the Amendment 7 document. As I emailed last year during this process I feel the fishery should be MANAGED FOR ABUNDANCE, using science and data, not politics. The fishery needs better management and more aggressive measures that have a higher likelihood of protecting this fishery while rebuilding the stock. I support aggressive measures to rebuild this fishery in 10 years or less. I would support seasonal spawning closures but not the way the current draft is written. I can't support an option for no-targeting closures that is not enforceable and offers no quantifiable gains. I feel Conservation Equivalency (CE) has been abused by states, limited the recovery of striped bass, and has led to states not meeting their conservation goals. I think CE should be removed from this Amendment, but since it doesn't seem like that's an option I have identified my support for options below in 4.6.2. Lastly, I feel that angler education should be an expectation not an exception on the part of the states and should be a priority moving forward.

Below you'll find a breakdown of my positions for each option.

#### **4.1**

##### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

##### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

##### **Tier 3**

Option A- Support A3

Option B- Support B2

##### **Tier 4**

Support A

## **4.2**

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D1

### **4.4.1**

Support B

### **4.4.2**

Support B

### **4.6.2**

Option B- Support B1-a

Option C- Support C3

Option D- Support D3

Option E- Support E2

Thank you for the opportunity to participate in this process,

Kurt Karwacky

Brunswick, Maine

**From:** [Paul Aquipel](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Friday, April 1, 2022 7:33:38 PM

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To the commission

Comments on Proposed striped bass Amendment 7.

My name is Paul Aquipel I am from Gloucester Massachusetts. I am an avid striped bass surfcaster who cares deeply for our striped bass fishery.

Although I live in a commercial fishing town my dream is to one day see Striped Bass become a Game fish and protected against commercial fishing. Over the years I've seen recreational striped bass fishing grow in my area. I believe this is a good thing economically and for striped bass. For the most part the young and upcoming striped bass fisherman I come across have a deep appreciation for the fishery. Let's keep it growing and make it strong for future anglers. **I have put my specific comments to the individual questions/tiers related to Amendment 7 in a simple list** for ease of data collection by the administrative staff. However, I have more comments below that I believe are important.

Briefly, here are my choices

#### **4.1**

##### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

##### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

##### **Tier 3**

Option A- Support A3

Option B- Support B2

##### **Tier 4**

Support A

#### **4.2**

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D1

#### 4.4.1

Support B

#### 4.4.2

Support B

#### 4.6.2

Option B- Support B1-a

Option C- Support C3

Option D- Support D3

Option E- Support E2

#### **I also have several other comments I would like to make:**

· The public information document for Amendment 7 was very complex and I believe it dissuaded public engagement. It was far too long, with too much jargon and unnecessary details. I know, for a fact, that this prevented people from engaging in the process, or submitting comments- it was too much time and effort to even read the document, let alone understand all the nuance and details, and then comment on all the choices. **In the future, at minimum there should be some kind of summary document that is short enough for the average citizen to read in less than 15-minutes, which can be understood by everyone.**

· The ASMFC has stated that the public is losing faith in their ability to make swift, critical decisions based on science and public input. **Please, act fast and in accordance with science and the majority's wishes:** do not delay or we will lose this fishery forever.

· This is a critical moment for the striped bass, and we all- including the commission- know it. **Please, consider managing the striped bass for abundance and not for yield** when making your decisions. Note that the striped bass fishery is almost entirely a recreational, catch and release, fishery, and that is where the largest portion of the GDP generated by the fishery comes from. The good news is, **the more fish in the ocean, the better it is for everyone: the fish, the economy, and the citizen angler..**



· In the past, the ASMFC has adopted measures with low statistical chances of being successful, over very long timelines. I believe this is the wrong way to manage this fishery. **We need better management and more aggressive measures that have a higher likelihood of protecting the fishery, and rebuilding and responding more quickly.** I am in support of management that favors keeping “too many” fish in the ocean, and responding to low spawning years and increased effort on a year-by-year basis.

· I am in total opposition to any measure that would decrease the benchmarks the fishery is managed by. **That is, we should not be lowering or shifting baselines. We have managed the population well in the past, and should never consider decreasing our population targets** (SSB thresholds and triggers). A sliding base-line is unacceptable and will be the demise of this fishery!

**Above all else, I ask that the ASMFC act quickly, decisively, and with abundance- not yield- at the forefront of their striped bass management decisions. We must rebuild this fishery in less than 10-years, and at all costs, and that requires immediate and aggressive action from the commission.**

Thank you for the opportunity to comment, and hope that my voice will be heard, and we can save this important and beloved fishery.

Sincerely,  
Paul Aquipel  
Gloucester, MA

**From:** [Mary Perrino](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7 of the Atlantic Striped Bass Fishery Management Plan  
**Date:** Friday, April 1, 2022 7:26:53 PM

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Dear ASMFC Commissioners,

I am writing from Brooklyn, NY as a woman recreational angler concerned with the state of the striped bass. Striper fishing is very important to me and I fish the waters of New York, Connecticut, Rhode Island and Massachusetts. I have noticed the deterioration of fishing over the past years. As the group responsible for fish management, I feel you must be much more conservative in your regulations. I have heard the stripers collapsed in the 1980's and fear the management decisions of the ASMFC are heading us there again. That would be tragic. I also would like to see more women on your commission. Perhaps they would be more careful with the fish and not kill so many. I have listed below my votes for options related to Amendment 7:

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, I believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically,

- Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level
- Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates
- Option D3, which would require an uncertainty buffer of 50% for proposed CE programs for non-quota-managed fisheries
- Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

On 4.1 Management Triggers,

- Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality
- Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold
- Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions
-

Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

#### 4.2 Recreational Fishery Management Measures

- Option B Seasonal Closures:
- -Sub-option B2-b. No-Targeting Spawning Closure Required: All recreational targeting of striped bass would be prohibited for a minimum two-week period on all spawning grounds (not necessarily the entire spawning area) during Wave 2 (March-April) or Wave 3 (May-June), as determined by states to align with peak spawning. States will determine the boundaries of spawning ground closures. Closures prohibiting recreational targeting on spawning grounds have already been implemented in Maine (Kennebec River), New Jersey (Delaware River), and Maryland (Chesapeake Bay) during part of Wave 2 and/or Wave 3.

On 4.2.2 Measures to Address Recreational Release Mortality,

- Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method
- Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation,

- Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. I recognize this option may require more restrictive management measures than option A, which I support

On 4.4.2 Rebuilding Plan Framework,

- Option B to allow the Board to take direct management actions as I'll as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

Best,

Mary Perrino

88 Meserole Ave 2E

Brooklyn, NY 11222

**From:** [James Nash](#)  
**To:** [Comments](#)  
**Subject:** [External] Fwd: Amendment 7 comments  
**Date:** Friday, April 1, 2022 6:44:29 PM

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----- Forwarded message -----

**From:** **James Nash** <[nashjamesc@gmail.com](mailto:nashjamesc@gmail.com)>  
**Date:** Thu, Mar 24, 2022 at 1:33 PM  
**Subject:** Amendment 7 comments  
**To:** <[comments@amfsc.org](mailto:comments@amfsc.org)>  
**CC:** <[Stripercomments@gmail.com](mailto:Stripercomments@gmail.com)>

ASMFC members,

My name is Jim Nash, I'm a veteran, a father and a striped bass fisherman. I am offering my comments y on amendment 7. The Striped Bass fishery is largely a recreational one, so while I do think it is fair that the recreational fishing community bears its fair share of the load, a full examination of where the commercial fishing industry impacts the Striped Bass, particularly in spawning areas is also worth the commission's time.

It is time now, by law for management action to be taken. The biomass is overfished, and overfishing is occurring.

As for amendment 7, my comments are as follows.

#### 4.1 Management Triggers

##### Tier 1

I support

- Option A. Sub option A1 (Status Quo)
- Option B. Sub-Option B1 (Status Quo)
- Option C. Sub-Option C1 (Status Quo)

##### Tier 2 SSB Biomass Triggers

- Option A Sub Option A2
- Option B Sub Option B1 (Status Quo)
- Option C Sub Option C1

##### Tier 3 Recruitment Triggers

- Option A Sub Option A2
- Option B Sub Option B2

##### Tier 4 Deferred Management Plan

- Option A Status Quo
- NO DEFERRED MANAGEMENT PLAN

#### 4.2.2 Measures to Address Recreational Release Mortality

- Option C Sub Option C1
- Option C Sub Option C2

Option D. Sub Option D2

4.4 Rebuilding Plan

Option B

4.4.4 Rebuilding Plan Framework

Option B

4.6.6 Management Program Equivalency

Option B Sub Option B1-a

Option C Sub Option C3

Option D Sub Option D2

Option E Sub Option E2

Thank you for your time and attention,

Jim Nash

**From:** [Thomas Kosinski](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 1, 2022 4:22:46 PM

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Dear Commission Members,

Below, I have outlined my comments on proposed Striped Bass Amendment 7.

My name is Thomas Kosinski and I reside in the state of New Jersey. I am an avid surfcaster and I specialize in light tackle and fly fishing. I am currently starting my own charter service. Over the past 17 years, I have traveled from New Jersey to Massachusetts, invested \$100,000s in boats, gear and accommodations chasing striped bass. Before I comment on the individual pieces of the proposed Amendment 7, I would like to make a few general comments and recommendations.

My comments to the individual questions/tiers related to Amendment 7 in a list at the end of this document. I have highlighted a few notes of importance prior to outlining my specific preferences.

- The public information document for Amendment 7 was quite complex and I believe it dissuaded public engagement. In the future, at minimum, there should be a summary document that is short enough for the average angler to read in less than 15-minutes and can be understood by everyone. This engages public participation instead of discouraging folks from getting involved.
- The ASMFC has stated that the public is losing faith in their ability to make swift, critical decisions based on science and public input. Please, act fast and in accordance with science and the majority's wishes: do not delay or we will lose this fishery forever. We are already behind in the current 10-year rebuilding process.
- This is a critical juncture for the striped bass. Please, consider managing the striped bass for abundance and not for yield when making your decisions. Note that the striped bass fishery is almost entirely a recreational, catch and release, fishery, and that is where the largest portion of the GDP generated by the fishery comes from. The good news is, the more fish in the ocean, the better it is for everyone: the fish, the overall economy, and recreational anglers.
- In the past, the ASMFC has adopted measures with low statistical chances of being successful, over very long timelines. I believe this is the wrong way to manage this fishery. We need better management and more aggressive measures that have a higher likelihood of protecting the fishery, and rebuilding and responding more quickly. I am in support of management that favors keeping "too many" fish in the

ocean and responding to low spawning years and increased effort on a year-by-year basis.

- I am in complete opposition to any measure that would decrease the benchmarks the fishery is managed by. That is, we should not be lowering or shifting baselines. We have managed the population well in the past and should never consider decreasing our population targets (SSB thresholds and triggers). A sliding baseline is unacceptable and will be the demise of this fishery and will discourage angler participation.
- Above all else, I ask that the ASMFC act quickly, decisively, and with abundance- not yield- at the forefront of their striped bass management decisions. We must rebuild this fishery in less than 10-years, and at all costs, and that requires immediate and aggressive action from the commission. We are already behind in our rebuilding schedule.
- As a recreational angler in New Jersey, I have witnessed the abuse of the bonus program. When less than half tags that are allocated are returned, it means one of two things. Folks aren't tagging all of the fish that they are harvesting or there are not enough fish to fill the quota! This program has practically become a "get of jail free" card for folks harvesting undersized fish. I have personally witnessed undersized fish being harvested at marinas and on shorelines across the state without affixing a tag. This program should be suspended indefinitely. When SSB thresholds reach target levels, it may be reconsidered if it is used properly for science-based research.

Below, I have outlined my preferences for Amendment 7.

On 4.1 Management Triggers, I support:

- Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality
- Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold
- Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions
- Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, I support:

- Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method
- Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, I support:

- Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. We recognize this option may require more restrictive management measures than option A, which we support

On 4.4.2 Rebuilding Plan Framework, I support:

- Option B to allow the Board to take direct management actions as well as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, “Management program equivalency (also known as “conservation equivalency” or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

I believe in restricting the use of conservation equivalency (CE) based on stock status.

Specifically, I support:

- Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level
- Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates
- Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries
- Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

Thank you for providing the opportunity to comment on Amendment 7. I look forward to learning the outcome of the upcoming stock assessment and to reading the final version of the Amendment.

Regards,

Thomas Kosinski

Red Bank, New Jersey



**From:** [Vigmostad Ralph](#)  
**To:** [Comments](#)  
**Subject:** [External] striped bass amendment 7  
**Date:** Friday, April 1, 2022 3:10:06 PM

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I strongly recommend the following 4.1 tier 1 option A1,B1,C1 tier 2 option A2,B1, C1 tier 3 option A3, B2 tier 4 OPTion A. 4.2.2 option A, C1,C2, D1, 4.4.1 option B, 4.4.2 option B, 4.6.2 sub option B1a,B1c,B2b, C3, D3, and E2. We have been far to weak in this matter for too long. Bite the bullet and take this problem seriously . Some stakeholders may be hurt in the short term but they will benefit in the long run.

**From:** [Jeff Norton](#)  
**To:** [Comments](#)  
**Subject:** [External] Striper management for MA  
**Date:** Friday, April 1, 2022 3:04:36 PM

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Hi- I won't be able to attend any of the public hearings but I have some thoughts on striper management (as a 20+ year fisherman in Plymouth/ CCB area. )

Like many of us I've noticed a distinct drop in the amount of fish. I don't care what commercial guys say about the "biomass" being in other areas/ deeper water etc. there are much less fish period.

My thoughts are:

1) make the fishery catch and release only. (I've read a lot about catch and release mortality- mostly by commercial guys) but I've almost never seen a dead fish floating around. 2) ban fishing in cape cod canal. This is the equivalent of a herring run for bass. Not to mention a great deal of poaching stems from this area  
3) close down commercial fishing. They've ruined the cod and soon to be bluefin tuna and bass. I hate to be harsh but they can find a different job. There are lots to choose from right now.

I'll be anxious to see how this all turns out and if we can save the species before it's too late. It will of course require cooperation from the Chesapeake up through Nova Scotia

Thank you for listening

Jeff Norton

**From:** [Bob Olsen](#)  
**To:** [Comments](#)  
**Cc:** [Megan Ware](#); [Stephen Train](#); [Sen. Dave Miramant](#); [Renee Zobel](#); [RITCHIE WHITE](#); [Dennis Abbott](#); [Dan Mckiernan](#); [Raymond Kane](#); [Sarah Ferrara](#)  
**Subject:** [External] Amendment 7 comments  
**Date:** Friday, April 1, 2022 2:40:34 PM

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To the ASMFC [,et.al](#)

I am writing in response to the Public Comment posting on Amendment 7. Thank you for this opportunity. I'm a landlocked but avid (30+ days/year) striped bass fly angler, mainly in Maine, NH and MA. I have spent and will spend a significant amount of money in these states on food, lodging, guides, gear, etc.

I know you are (all) busy and will keep this short:

### **1. Management Triggers:**

- Please vote to keep the management triggers as they are but shorten the response times to 1 year versus 2 years.
- Maintain a 2-year deadline to implement a SSB rebuilding plan.
- Reduce fishing mortality in 1 year (which has been demonstrated), not 2 years.
- Do not defer management action.

### **2. Management Program Equivalency :**

- Please do not allow the use of an equivalency, at least until SSB dips below the overfishing level.
- Reductions should be in line with the degree of overfishing that is occurring in each state.

### **3. Rebuilding Plan:**

- I support Option B - we need to find every avenue to shorten response times, in this case for the time needed for rebuilding.

### **4. Recreational Release Mortality:**

- I support sub-option D2 to support education on playing and handling fish in a way that would limit release mortality.
- I also support C1 and C2. That is, I agree with the ASGA's stance that gaffs should be replaced with rubber-meshed nets (C1), and that by-catch stripers caught on J-hooks should be released unharmed (C2).

Thank you for your time.

Bob Olsen  
1612 Shaw Mansion Road  
Waterbury Center VT 05677  
802-355-8501

From: [Kyle Schaefer](#)  
To: [Comments](#)  
Cc: [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
Subject: [External] Draft Amendment 7  
Date: Friday, April 1, 2022 2:12:51 PM

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Good Afternoon,

My name is Kyle Schaefer and I am pleased to officially submit my public comment on Draft Amendment 7. I work in the fishing industry year round. I run a fly fishing lodge in the Bahamas in the summer and operate a charter business in Maine late May through October. I am also the Maine board member for the American Saltwater Guides Association and work closely with a number of fishing brands (Costa, Patagonia, Thomas & Thomas, etc.) that depend on a healthy fishery to be in business.

This document is incredibly complex and difficult to provide public comment on. I have submitted my comments below in a format that uses ASGA's Amendment 7 document as a guide. In no way shape or form is the below comment a form letter. These are my own opinions & selections.

My guiding business is poised to grow. I could easily hire 2 or 3 guides at this exact moment and fill their boats with clients everyday this summer. Instead I am holding back, waiting to see what ASMFC does before I invest into growing my business. All of us guides, and coastal businesses depend on stable fisheries to make our living. Instead of growing my striped bass business I've invested into a business in the Bahamas where the fishery is thriving and dependable. I could easily have brought that investment to Maine but the fishery management and future of striped bass is just too uncertain.

I hope for predictable and well managed stocks for the future. Abundance and conservative management helps us all thrive. Thank you for the time. My specific selections follow:

#### **4.1 Management Triggers -**

Tier 1: Fishing Mortality (F) Triggers

##### **Option A: Timeline to Reduce F to the Target**

**Kyle Schaefer - Supports Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year.

##### **Option B: F Threshold Triggers**

**Kyle Schaefer - Supports Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a

level that is at or below the target within the timeframe selected under Option A.

### **Option C: F Target Triggers**

**Kyle Schaefer - Supports Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

Tier 2: Spawning Stock Biomass (SSB) Triggers

### **Option A: Deadline to Implement a Rebuilding Plan**

**Kyle Schaefer - Supports Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

### **Option B: SSB Threshold Trigger**

**Kyle Schaefer - Supports Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

### **Option C: SSB Target Trigger**

**Kyle Schaefer - Supports Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

Tier 3: Recruitment Triggers

### **Option A: Recruitment Trigger Definition**

**Kyle Schaefer - Supports Sub-option A2:** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

### **Option B: Management Response to Recruitment Trigger**

**Kyle Schaefer - Supports Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the

interim F target within one year.

Tier 4: Deferred Management Action

**Kyle Schaefer - Supports Option A (status quo): No Deferred Management Action.**

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

**4.2.2 Measures to Address Recreational Release Mortality**

**Option C. Additional Gear Restrictions**

**Kyle Schaefer - Supports Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**Kyle Schaefer - Supports Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

**Option D. Outreach and Education**

**Kyle Schaefer - Supports Sub-option D2:** It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

**4.4 Rebuilding Plan**

**4.4.1 Recruitment Assumption for Rebuilding Calculation**

**Kyle Schaefer - Supports Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

**4.4.2 Rebuilding Plan Framework**

**Kyle Schaefer - Supports Option B:** 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 recruitment assumption specified in Amendment 7) 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.

#### **4.6.2 Management Program Equivalency (Conservation Equivalency)**

##### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

**Kyle Schaefer** - **Supports Sub-option B1-a:** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

##### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

**Kyle Schaefer** - **Supports Sub-option C3:** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

##### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

**Kyle Schaefer** - **Supports Sub-option D2:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

##### **Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

**Kyle Schaefer** - **Supports Sub-option E2:** the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Best,

Kyle Schaefer

US & WhatsApp - 603.969.3050

Bahamas - 242.451.8758

[Soul Fly Lodge // Bahamas Flats](#) || IG: [@SouIFlyLodge](#)

[Soul Fly Outfitters // Maine Stripers](#) || IG: [@KyleSchaeferFlyFishing](#)

**From:** [kenlocke812](#)  
**To:** [Comments](#)  
**Subject:** [External] Stripers on the hudson  
**Date:** Friday, April 1, 2022 11:51:36 AM

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Hello as an avid striper fisherman I have witnessed an increase of stripers in the hudson for the past 5 years. NYS Dec has managed the Hudson effectively. Circle hooks and proper handling of fish are key to keep moving forward. I'm seeing way less mortality in the stripers being released from previous years when treble hooks were allowed. Educating our fishermen is key to success not more restrictions for the Hudson. Thanks for your time sincerely Ken.

Sent from my Galaxy



**From:** [Ken Webber](#)  
**To:** [Comments](#)  
**Subject:** [External] Proposed Amendment 7  
**Date:** Friday, April 1, 2022 11:33:33 AM

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ASMFC Members,

I would like to express support for the most conservative options possible to be taken as soon as possible in order to rebuild the full range of the Striped Bass stock.

The slot size regulation will eventually lead to fewer larger fish if it hasn't already. I advocate for catch and release only with no commercial fishery.

Having said that I also advocate for more stringent management of the menhaden fishery since it's the primary food source for striped bass.

More study is needed to understand the impact of the increasing seal population on the striped bass stock. The ASMFC should work with congress to develop more ecologically appropriate regulations to control the seal population, if necessary.

Finally, I advocate for more rigorous enforcement of existing rules. I have personally observed poaching by recreational fishermen and stretching of the rules by boat captains allowing customers to take home more fish by allocating their personal catch limits to customers.

Thank you for your consideration. I wish you well as you sort through this complex issue.

Sincerely,

Ken Webber  
Attleboro, MA

**From:** [gunfan2001@aol.com](mailto:gunfan2001@aol.com)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, April 1, 2022 9:24:46 AM

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Ms. Franke,

Thank you for the opportunity to comment on this matter. The striped bass fishery is indeed in need of serious help. In 2020 I settled in DE but have been fishing down there since the early 80's. The last good season of fishing I had was around 2010. Last season I caught quite a few striped bass but only 2 weighed over 10lbs. I'm a catch and release fisherman so everything goes back in the water. Back in the early 2000's it was common to go out in a morning and catch a dozen bass that all weighed over 10lbs with a few pushing 20. I think a huge step to protecting this great fish is to declare them a game fish like they did with the red drum down south. This was a huge success, red fish numbers are way up now and the species are thriving. End the commercial sale of stripe bass and make the limit one fish per day between 22-28". Save the large fish for breeding and catch and release. I would also say the same should be done for the weakfish and bluefish but that's for another time.

r/  
Andy Stauffer

**From:** [dexchads@aol.com](mailto:dexchads@aol.com)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass angler Input  
**Date:** Friday, April 1, 2022 9:01:25 AM

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My name is Dex Chadsey,

I am a recreational surfcaster from Massachusetts, fishing primarily for Striped Bass in the waters of Cape Cod, Cuttyhunk, and Block Island. I am alarmed by the decline of Striped Bass stocks and the lack of recent overall spawning success.

I am also sickened by the selfish, disgusting behavior of those people who abuse this resource by poaching and practicing what is known as "high grading". People who intentionally take fish that are too small, take too many, or toss a dead fish into the water so they can keep a larger one. To see the white bellies of several dead 20 pound bass floating in the current of the Cape Cod Canal pushes one to a point beyond anger.

I believe that we cannot only blame others nor demand sacrifices from only those who fish differently or in other geographical areas than we do. Traditionally, recreationalists blame the commercials, surf guys blame the boat guys, beach guys blame the Canal guys, we all need to bear a part of the blame and be part of the solution.

I strongly support a slot limit for Striped Bass but believe that the current 28" minimum does not give enough fish the needed spawning time. A 28" minimum only allows 3 years of spawning time while a 31" minimum would allow 4 - 5 years for a Bass to spawn before possibly being killed. I support a 31" - 35" slot limit. This slot limit should be enforced uniformly all along the Atlantic Coast. To allow different regulations on a migrating fish is ludicrous.

As a Massachusetts and Cape Cod Canal Fisherman, I support the present regulation of no commercial fishing in the Canal. I also believe that the Cape Cod Canal should be catch and release only, but that is probably a discussion for another day. The fish are just too vulnerable in that stretch of water, particularly the larger fish.

As far as commercial regulations go, I understand allowing commercial fishermen to take a greater number of fish than recreational fishermen. What I don't understand is allowing them to take large numbers of the larger fish. This is absolutely counter productive to the goal of improving spawning success of the Striped Bass bio mass. The larger fish need to be saved, not killed. This seems like a sellout by regulators to me.

I support the use of circle hooks when bait fishing and I started using them several years ago to avoid the gut hooking of fish that happens when using J hooks.

I strongly support making Striped Bass a sport fish that can be taken by rod and reel only. I am haunted by the massive hauls of large bass that I see as a result of shore based netting from some areas of the Atlantic Coast. Certain historical methods of fishing, such as the fish weirs we see in Cape Cod Bay, or the nets off the West Wall in Rhode Island, are glamorized and declared a never ending right for those who now take more than their share at a time when the resource can not withstand that amount of reduction. I have seen this pattern repeated multiple times in the fishing industry. The resource is overfished by those who are in it for the quick buck without any regard for sustaining the fishery. Then they all cry poor and ask for government subsidies when there are no more fish to catch. Swordfish, Cod, Flounder, Menhaden and large Blue Fin Tuna have all been decimated in this way. Fishermen don't have a perpetual right to fish a certain way just because their great, great Grampa did that 100 years ago. If that argument was used in the business world the government would be subsidizing the production of 8 track tapes!

I also can not understand why the Striped Bass are allowed to be hammered all winter long as they hold

off the mid Atlantic Coast. They are exceedingly vulnerable. We have all seen the photo of the young woman sitting on top of the pile of huge Striped Bass as the charter boat makes it's way back to port. The excess is disgusting!

I support the restriction of fishing for Striped Bass in spawning areas during the time of year they are spawning. It makes no sense to cause stress or eliminate large Bass full of eggs before they have a chance to spawn.

Thank you for your attention,

Dex Chadsey  
dexchads@aol.com  
508-320-6430

**From:** [G2W](#)  
**To:** [Comments](#)  
**Cc:** [Emilie Franke](#)  
**Subject:** Fw: [External] Striped Bass Amendment 7 Discussion  
**Date:** Friday, April 1, 2022 8:58:56 AM

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**From:** Theodore H Carski <thcarski@gmail.com>  
**Sent:** Thursday, March 31, 2022 12:58 PM  
**To:** G2W  
**Subject:** [External] Striped Bass Amendment 7 Discussion

Thanks for organizing an excellent discussion. It was informative and efficient. The use of the real-time poll was much appreciated.

On education, I believe this should be required. Suggest adding points emphasizing these measures are not onerous and have already been taken or are being used successfully to protect other fisheries...

- circle hooks and prohibition of gaffs already used in MD for striped bass
- wet hands or wet rag rather than touching fish used for bonefish
- rubber coated nets already used for trout by many fishers
- barbless hooks already used for trout by many fishers
- don't remove fish from water already used for tarpon in FL
- if picture is a must, be ready and quick, so fish is out of water for seconds not minutes
- if Trophy season is not eliminated, educate/promote moving fishers to Catch and Release Trophy tournaments as done for white marlin and large mouth bass

Thanks for consideration, Ted Carski

**From:** [Val Pinkhasov](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, March 31, 2022 10:29:50 PM

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Dear ASMFC,

I'm a surfcaster from Sandwich, Massachusetts. I fully support amendment 7, as it is the only chance we have at saving 'every man's fish' - the striped bass. I fully support the measures that amendment 7 introduces to help reduce recreational mortality, improve spawning stocks/biomass, rebuild striped bass to a healthy population - and most importantly... educate the public and manage the fishery to a place where we can enjoy it forever.

I am new to this sport, but I have fallen in love with it so quickly. I want to be able to share this passion with my family and children. I don't want striped bass fishing to become just a memory. Amendment 7 is critical to making sure we don't lose 'every man's fish' - and making sure that businesses built around this amazing fishery can thrive along the way.

Sincerely,  
Val Pinkhasov

**From:** [Colin Temple](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Ammendment #7  
**Date:** Thursday, March 31, 2022 10:21:45 PM

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Good evening ASMFC committee members,

I am writing to you tonight to express my views on Ammendment 7 and the proposals currently under consideration for striped bass management. I am a striped bass fly fishing angler living in Massachusetts.

Action in rebuilding this fishery cannot be delayed. These fish are a precious natural resource that should be managed to abundance so that our kids and our grandkids have the same opportunity that we have had to spend time outdoors enjoying the thrill of fishing.

I am in **full support** of the American Saltwater Guide Association's positions on each of the items in question. (<https://saltwaterguidesassociation.com/wp-content/uploads/2022/03/ASGA-A7-POSITION-FINAL.pdf>)

Please review and consider implementing each of these changes at your earliest convenience. Our beloved fish is under threat, and with the 2015 class of fish now likely entering the slot limit I am concerned that 2022 is going to do VERY serious damage to the status of the fishery. These things CANNOT wait. Changes need to be made, and the stock needs to be rebuilt within the original 10 year timeline, or sooner if possible.

Thank you sincerely for your time this evening.

--

Colin J Temple  
(802)558-6431

**From:** [Robert McMahon](#)  
**To:** [Comments](#)  
**Subject:** [External] Striper bass pid  
**Date:** Thursday, March 31, 2022 7:49:15 PM

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Closing fishing is unacceptable in the hudson river. Poaching is the number one problem. You dont need a phd to know that.

Sent from my iPhone



**From:** [Roy Cooley](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, March 31, 2022 7:08:34 PM

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Dear Sirs,

I support stronger conservation for the protection of our striped bass population, am not happy and am paying close attention to the Commission's actions. Like most recreational anglers, I contribute more to the local economy per fish than a commercial fisherman. Last year, for 4 days of fishing, 2 of us logged miles on the Mass Pike, tanks of gas, 4 nights in a motel on the Cape, 4 dinners and drinks in restaurants, and 2 days with a local guide. And, we released every fish we caught.

We need a 10 year commercial and recreational harvest moratorium.

Thank you, Roy Cooley

Sent from my iPhone

**From:** [Ryan Collins](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 Public Comment  
**Date:** Thursday, March 31, 2022 1:29:02 PM

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Dear ASMFC,

I personally feel that striped bass (along with many species of fish and animals) are under tremendous stress right now. Fishing pressure, development, environmental changes, technology, and many other factors are having detrimental impacts on striped bass and other species.

Therefore my recommendation and hope is that the management board makes conservation of the species, and rebuilding the population, as their most important objectives. I am personally onboard with whatever measures are necessary to achieve those two goals as quickly as possible.

Best regards,

Ryan Collins



Founder & Creator  
[myfishingcapecod.com](http://myfishingcapecod.com)

**From:** [Henry Barber](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, March 31, 2022 12:04:46 PM

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To Whom Might Concern,

I have read through the various issues with regard to Amendment 7 and looked at the various issues to be voted on. I would prefer to state my points below.

I am writing to you on behalf of our beloved Maine stripers, fisherman and fisherwomen and ecosystem in general. I have owned a home on the coast of Maine since 1980. I have been fishing for stripers almost as long. Fortunately and unfortunately I have seen the ebb and flow of size, numbers and general health of stripers and other species during that time. I have my own rhythm through the season that progresses from 6 wgt to 8 wgt to 10 wgt rods. I look forward to adjusting my flies and tactics throughout the season to challenge myself and to hopefully adjust to the sizes and numbers of fish. How is it that I can catch 3, 7, 20, 6, 50, 4, 12 fish per day over the course of a week during a hot season and then one season be shut out? How is it that one year we can't catch fish under 19" and then all of a sudden we can't catch anything over 17"? I am confused about many things but I am not confused about this. The fish we get in Maine are severely affected in their size and numbers before they reach their final state in the United States of America. I believe the following points need to be addressed in order of importance.

1. I think this rules should go into effect consistently from Maryland to Maine.
2. I think party boats (more than 4 people) should adjust their fishing strategy to bottom fish, chase blues when they are in etc.
3. I think all bait fishing should be banned so that fish can't swallow hooks into their stomach, which I believe increases mortality.
4. Most important I think we shouldn't (any fisher person) be allowed to keep any fish under 36 inches as this will render the points above unnecessary. I think it is utterly stupid that we have various slot limits around 26" and 28" state by state when bass start producing a 100,000 eggs or more at 28". Thirty six inches would give fish at least 8 years to flood the ocean with progeny.
5. I also think it should be against the law to sell any wild striped bass in any state or exported internationally. Only farm raised fish should be sold. (I recognize this presents another entire range of issues.) That way people's taste for wild fish maybe appreciated more in 2030 when this moratorium is lifted.

I have fished in over 18 countries all but three in the salt. I recently had a spectacular tarpon and bonefishing trip with a friend. We fished nine different flats. On one flat we fished to hundreds bonefish everyday (4 days) that we fished it. We did not see one bonefish at all on the remaining eight flats. We asked our guide / friend why there no fish elsewhere, his answer was chilling. These other flats that usually produced fish had been over fished and netted by the locals. True story! it is happening here, now! Do we want it to happen? No is it reality? Yes.

Take the guides and personal (single fisher persons) seriously. We recognize the healthy ecosystem for what it is. Clean water tons of bait everywhere and encouraging signs seasonally of shad, sea run brown trout etc. What we also recognize is that stripers are not in

that mix.

Cheers,

Henry C. Barber

7 Green Drive  
Hale's Location, NH 03860

Camp Ellis / Saco Maine and Boothbay Maine in the summer

**From:** [Nick Murray](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [Jerry Audet](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, March 31, 2022 11:46:01 AM

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Dear Commissioners,

My name is Nick Murray and I live in Brooklyn NY. I am an avid surf caster and I care deeply for the striped bass fishery and the environment.

I am writing to you today to comment on the proposed striped bass Amendment 7.

The largest majority of people with an interest in the striped bass population is the recreational community and we spend significant amounts of money in pursuit of striped bass. If the bass continue to be poorly managed, as I feel they have since the implementation of Amendment 6, we may lose many of those participants forever as the population continues to decline and heads for a crash. We need better management and more aggressive measures that have a higher likelihood of protecting the fishery, and rebuilding stocks more quickly. I am in support of management that favors keeping “too many” fish in the ocean, and responding to low spawning years and increased effort on a year-by-year basis.

I have been very frustrated with the management process to date and I have little faith left in ASMFC's ability to manage the striped bass population to a level that serves the interest of the bass, that is beyond just continued survival, and the people to have plenty of bass to catch. Please prove me wrong! The public information documents provided were dense and very difficult for a lay person to understand. It has only been through the clarifying materials provided by conservation organizations and journalists that I have come to understand what is being proposed.

I want to see ASMFC take immediate action in line with scientific recommendations and public guidance, as we clearly desire that the striped bass population be managed for abundance as opposed to yield.

Here are a few key points that I found online in regards to the potential management plan and I agree with:

*· I am in total opposition to any measure that would decrease the benchmarks the fishery is managed by. **That is, we should not be lowering or shifting baselines. We have managed the population well in the past, and should never consider decreasing our population targets (SSB thresholds and triggers). A sliding base-line is unacceptable and will be the demise of this fishery!***

*· While I would be in favor of closing spawning areas to both harvest and targeting of striped bass, there is no scientific evidence it would lead to any appreciable increase in the size of the population (SSB or YOY). If the commission can prove it would, I would absolutely be in favor of this measure- and even longer periods of closed fishing, if that would help even more. However, I fear some states will ultimately fight so hard against this measure, that they will not be willing to accept other, more important parts of this amendment. That, and law enforcement has deemed this measure unenforceable. For this reason, at this time, I do not support 4.2, tier B. However, **I would be in support of closures if these concerns could be***

*addressed, and would even support stricter and/or longer closures if it ultimately leads to abundance.*

*Above all else, I ask that the ASMFC act quickly, decisively, and with abundance- not yield- at the forefront of their striped bass management decisions. We must rebuild this fishery in less than 10-years, and at all costs, and that requires immediate and aggressive action from the commission.*

#### **4.1**

##### **Tier 1**

*Option A- Support A1*

*Option B- Support B1*

*Option C- Support C1*

##### **Tier 2**

*Option A- Support A2*

*Option B- Support B1*

*Option C- Support C1*

##### **Tier 3**

*Option A- Support A3*

*Option B- Support B2*

##### **Tier 4**

*Support A*

#### **4.2**

*Option B- Support no measure*

*Option C- Support C1, C2*

*Option D- Support D1*

##### **4.4.1**

*Support B*

##### **4.4.2**

*Support B*

##### **4.6.2**

*Option B- Support B1-a*

*Option C- Support C3*

*Option D- Support D3*

*Option E- Support E2*

Thank you for the opportunity to comment, and hope that my voice will be heard, and we can save this important and beloved fishery.

Sincerely

**Nick Murray**  
**Brooklyn NY**

From: [Capt. Mike](#)  
To: [Comments](#)  
Cc: [Justin Davis](#)  
Subject: [External] draft amendment 7  
Date: Thursday, March 31, 2022 9:23:27 AM

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Dear ASMFC

Amendment 7 is over complicated and difficult to understand. This puts an occasional angler that likes to eat Striped Bass at a deliberate disadvantage, and he will not attend this meeting or fear speaking as to sound uneducated.

Since 2014 **Great Action has been** taken to restore our Striped Bass Stock (by only the fishermen that eat Striped Bass): from 2 fish minimum length @28", to a single fish, to a single fish in a narrow 7" slot. What action has Catch-n-release anglers taken to control their killing? Now 54% of all Striped Bass killed are from the catch n release user group. Crabs are eating more Striped Bass than humans.

I document and share FlyingConnie's complete Striped Bass harvest with releases. We have proven the slot limit has produced a greater than 20% reduction in harvest. Our Striped Bass are hooked by a single J hook, fought on heavy tackle without line stretch and only quickly measured and handled by our professional mate, We target Striped Bass during peak tide and return to bottom fishing when tide breaks, about an 1hour 30minutes per trip. My customers are conditioned and believe in the slot, "let the big fish breed" and the smaller fish eat better. Every trip wants the opportunity to striped bass fish, any closure should be applied to the winter hold over fishery. Averaging a 150 trips per season I have found healthy fat 25" Bass shaped like a tuna fish, I have seen competitive feeds restored and last year had 2 months of big fish thriving on bunker in shallow water up to 49" in length. The key to restoring/maintaining a fishery is about the forage, Omega protein harvest of bunker needs to be decreased and kept from harvesting in the mouth of the Chesapeake bay. Omega protein needs to be pushed out to sea.

From amendment 7, I would like to see a rebuilt threshold value as low as possible and afford State managers as much time and control if a trigger is met. I didn't have confidence in the last stock assessment as it combined the Hudson and Chesapeake stocks, hold over fish in CT and MA rivers were not credited, neither were the fish great than 3 miles from shore. Two very strong year classes were excluded from the assessment as well. For hire boats can't afford any in season closure, as we are being strangled by over regulation on every other species. Managing to "abundance" sounds like poor management. Food sources will be stressed supporting an abundance of Striped Bass, and it's just not natural. Crash our Northeast ecosystem just so an affluent fisherman stands a better chance to catch????

Thank you so much again for your time



## **Captain Mike Pirri**

President

FlyingConnie Charters LLC.

Cell: [203-515-1444](tel:203-515-1444)

Web: [www.FlyingConnie.com](http://www.FlyingConnie.com)

**From:** [Frank Walsh](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, March 30, 2022 7:50:00 PM

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Hello,

I hear so much about the Striped Bass fisheries being plentiful too stock is crashing. I can only go by my own experience and over the last three years I've caught one undersized bass. Quite a turn around from previous years which makes me believe the bass are in trouble. I fish Cape May county and make four or five targeted trips for bass a year, mainly surf fishing. Hopefully something can be done to help the fishery.

Frank Walsh  
1315 Idaho Ave.  
Cape May, NJ 08204  
[squidder329@gmail.com](mailto:squidder329@gmail.com)

**From:** [Aaron U](#)  
**To:** [Comments](#)  
**Subject:** [External] My opinion, everyone has one  
**Date:** Wednesday, March 30, 2022 7:26:06 PM

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Hello,

My name is Aaron Uehara. I am a transplant living in Haverhill, MA and have been in the Merrimack Valley area for the last 8 years. I am originally from Maui, HI and have been fishing my entire life.

I have had the privilege of experiencing a few fisheries in my day. And unfortunately most of them have been on the decline. By far, the striped bass fishery and all the elements that come with it have saved my life. I learned more about myself through my experiences on the water than any other aspect of my life.

I will continue by saying that I understand that there are complexities in population ecology beyond what most of us can comprehend (this especially includes scientists). With a background in Biology with a split between genetics and ecology, the literature published was a terrible approach in addressing the public. As you have learned since last year, the public has great interest in the subject, as many of us are very emotionally attached to the outcomes of the striped bass fishery.

There should be a serious movement towards abundance management instead of sustenance. It has been explained to me that this fishery that I have learned to love is a shadow of what it once was. Commercial and recreational activities has been responsible for this, or is at least one thing we can control. The most important thing the board can do to help, is better describe the entire scenario to the public, and have effective measures in place so that when thresholds are hit, responses can be made.

I am one of the few people who are open to the idea of another moratorium to reach the goals that I see fit. Abundance management. Once we see a health breeding population we should all be vigilant about better managing the entire population with less concern on short term financial gains (by both commercial and recreational industries). It stands to benefit us all.

My opinions on all the options are as follows.

**ADD IN ANY OF YOUR OWN PERSONAL COMMENTS HERE. MAKING THE EMAIL UNIQUE WILL HELP IT HAVE MORE OF AN IMPACT.**

Thank you for the opportunity to comment, and hope that my voice will be heard, and we can save this important and beloved fishery.

#### **4.1**

##### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

**Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

**Tier 3**

Option A- Support A3

Option B- Support B2

**Tier 4**

Support A

**4.2**

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D1

**4.4.1**

Support B

**4.4.2**

Support B

**4.6.2**

Option B- Support B1-a

Option C- Support C3

Option D- Support D3

Option E- Support E2

Sincerely,

Aaron Uehara

**From:** [myden52585@aol.com](mailto:myden52585@aol.com)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Ammendment Comments  
**Date:** Wednesday, March 30, 2022 1:58:20 PM

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Ms. Emilie Frank:

I am Capt. Marc Berger, owner / operator of Lucky Strike Charters and President of The CT Charter And Party Boat Assoc. [CCPBA] and have been involved in the fishing business for over 40 years. Striped bass management is an extremely important topic to me as a good percentage of both mine and CCPBA members trips are for stripers. Clients that we all take fishing enjoy fishing for stripers as well as being able to take them home to eat. The current slot limit of 28" - 34.9" implemented in 2,000 is working towards the rebuilding of striped bass stocks. Being out on the water every day we are seeing more and more large fecal fish than ever before. The current regulations need additional time to acheive the complete stock rebuilding success that is was intended for and should be allowed to remain in effect.

Fish stocks can not and must not be managed based on an abundance plan. Everything needs to be managed to a ECO based system to prevent a single species from taking over. With all for hire boats, fishing for stripers is accomplished with heavy tackle utilizing a single "J" hook which allows the fish to be landed quickly, minimizing it's energy expended, then handled by a professional mate to be quickly released if required, significantly reducing release mortality. The retention of the one fish per angler in the slot limit promotes a healthy ECO System management for this species.

I urge you to keep the current regulations Status Quo with NO season closures to continue the rebuilding of healthy striped bass stocks.

Regards, Capt Marc Berger Lucky Strike Charters

**From:** [FRED ZIVICKY](#)  
**To:** [Comments](#)  
**Cc:** [Fred Zivicky](#)  
**Subject:** [External] (Subject: Draft Amendment 7). "Stop the catching of alewives"  
**Date:** Wednesday, March 30, 2022 1:05:26 PM

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I tried to read thru the 141 pages of the Amendment but no where did I see any mention of the bait fish that the stripers need to stay healthy . I have fished in the Bay for over 50 years and it just gets worse . I used to see large schools of large alewives but for the past 4 or 5 years I rarely see any. The only thing I see on the surface is small bait fish that are only a couple inches.

I can't believe the state still allows Omega to catch all the alewives at the state line and very few make it further up the bay. Omega was caught taking way over the allowed limits but instead of being penalized they are still allowed to catch all the fish. Someone must be on the take to allow this to continue.

There should be a complete band on catching alewives by Omega until the stripers can get healthy and disease free and make a come back.

I also fish in New England and see schools of large alewives and bunker there but not any more in the bay.

Thx, Fred Zivicky  
Fzivicky@verizon.net

**From:** [Tony March](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 comment amended see (PS)  
**Date:** Wednesday, March 30, 2022 10:08:43 AM

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To Whom it may concern,

I am a recreational fisherman and have been so for 60 or more years. I have been listening to various people and associations as to what I should be asking the ASMFC to do to protect the Striped Bass Fishery. The following are some examples: Management Triggers support option A1, F Threshold Triggers support option B1, etc. etc. Moving on, Recruitment Triggers B2, under Tier 2 SSB Triggers support A2, on and on. Frankly speaking I don't really know. I expected an organization; your organization to do what was right to protect this fishery. I am aware of the plight of the Striped bass, Bluefish and Menhaden because I belong to a fishing club that has been in existence since 1952. The club has a long and proud record of supporting conservation efforts.

What I do know is this, since the club's founding in 1952 and the present day 75% of what was in the ocean is gone!

I also believe that practicing sustainable harvesting will bring this trend to an end.

Before your heads hit the pillow this evening ask yourselves If you can be the solution. I am sure that if you only consider the fishery you will make the correct decisions to protect it.

Thanking you in advance,

Anthony Marchisotto  
659 Hawkins Rd. E.  
Coram, NY 11727

PS: Whatever policies are put in place **ENFORCEMENT** of those policies is the only way to ensure success. If you have any authority to do so see that this is prioritised and/or pass this on to the DEC, Thanks again.

**From:** [Robert Sage](#)  
**To:** [Comments](#)  
**Subject:** [External]  
**Date:** Wednesday, March 30, 2022 9:58:18 AM

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I live in hyde park ny on the Hudson river up here we are taking the blunt of your regs. You can't take food off my table and give it to someone down the road. I have a God given right to those fish enough is enough . I protect the fish more than you. Don't make fishing a crime



**From:** [Jules](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Addendum 7 Public Comment - Julien Frank / New Rochelle NY  
**Date:** Wednesday, March 30, 2022 9:38:06 AM

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Julien Frank  
230 Pelham Road., Apt. 3C  
New Rochelle, NY 10805

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

March 30th, 2022

### **Draft Addendum 7 Public Comments**

I'm a recreational fisherman from New Rochelle, NY - my comments are as follows:

#### **Tier 1 Options: Fishing Mortality (F) Management Triggers**

##### **Option A: Timeline to Reduce F to the Target**

Sub-option A1 (status quo): Reduce F to a level that is at or below the target within one year.

- **My preference is Sub-option A1 - Status Quo**  
**I believe it makes sense to take a prudent stance and assess/adjust accordingly based on the data/feedback derived from action.**

##### **Option B: F Threshold Triggers**

Sub-option B1 (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A

- **I choose Sub-option B1 - Status Quo for the same reasons stated for my preference under Option A**

##### **Option C: F Target Triggers**

Sub-option C1 (status quo): If F exceeds the F target for two consecutive years and female

SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A

- **I choose Sub-option C1**

## **TIER 2 OPTIONS: Female Spawning Stock Biomass (SSB) Management Triggers**

### **Option A: Deadline to Implement a Rebuilding Plan**

Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan

The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment.

- **I choose Sub-option A2 - Two-Year Deadline to Implement a Rebuilding Plan**

### **Option B: SSB Threshold Trigger**

Sub-option B1 (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

- **I choose Sub-option B1 (Status Quo)**

### **Option C: SSB Target Trigger**

Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

- **I choose Sub-option C1 (Status Quo)**

## **TIER 3 OPTIONS: Recruitment Triggers**

### **Option A: Deadline to Implement a Rebuilding Plan**

Sub-option A3: The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model (NY, NJ, MD, VA) shows an index value that is below the median of all values in the respective JAI from 1992-2006, which represents a

period of high recruitment, for three consecutive years. The high recruitment reference period used for this trigger may be adjusted as recommended by the TC during benchmark stock assessments. This trigger alternative has a higher sensitivity than both the status quo trigger and sub-option A2 (Figure 1). This trigger alternative would have tripped six times since 2003: NY in 2006; MD in 2008; MD in 2009; MD and VA in 2010; NY in 2013; MD in 2014 (Table 2).

- **I choose Sub-option A3**

### **Option B: Management Response to Recruitment Trigger**

Sub-option B2. If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

- **I choose Sub-option B2**

### **TIER 4 OPTIONS: Deferred Management Action**

Option A (status quo): No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

- **I choose Option A**

### **4.2.2 Measures to Address Recreational Release Mortality**

- **I choose Option A (Status Quo)**
- **I would advocate that any monies that would be used for these initiatives otherwise be diverted to the hiring/training of additional ECOs to better enforce the regulations in effect.**

### **Option B. Effort Controls (Seasonal Closures)**

- **I Don't think any of this can be effectively deployed. Especially not a fan of sub-options B1 and B2**

### **Option C. Additional Gear Restrictions**

-

I choose Sub-option C1

- I choose Sub-option C2

#### Option D. Outreach and Education

- I choose Sub-option D2

#### 4.4.1 Recruitment Assumption for Rebuilding Calculation

- I choose Option B

#### 4.4.2 Rebuilding Plan Framework

- I choose Option B

#### 4.6.2 Management Program Equivalency

I choose all sub- options under Option B (sub-option B1)

- **Sub-option B1-a:** the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.
- **Sub-option B1-b:** the stock is below the biomass target. CE programs would not be considered until a subsequent stock assessment indicates the stock biomass is at or above the target level.
- **Sub-option B1-c:** fishing mortality is at or above the fishing mortality threshold (i.e., overfishing is occurring). CE programs would not be considered until a subsequent stock assessment indicates fishing mortality is below the threshold level.

**Sub-option B2. Applicability:**

I choose all sub-options under Sub-option B2

**Sub-option B2-a:** the Hudson River, Delaware River, and Delaware Bay recreational fisheries

**Sub-option B2-b:** quota-managed recreational fisheries (e.g., "bonus programs")

**Sub-option B2-c:** commercial fisheries (all of which are quota managed)

**Option C. Precision Standards for MRIP Estimates Used in Conservation  
Equivalency Proposals**

- **I choose Sub-Option C3 - Not exceeding 30%SE**

**Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed  
Fisheries**

- **I choose Sub-Option D3 - 50% UB**

**Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed  
Fisheries**

- **I choose Sub-option E2: the percent reduction/liberalization projected for the FMP  
standard at the state-specific level.**

Thank You,

Regards,

Julien Frank

**From:** [Gary Funck](#)  
**To:** [Comments](#)  
**Subject:** [External] DRAFT AMENDMENT 7  
**Date:** Wednesday, March 30, 2022 7:33:15 AM

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To: Emile Franke  
From: Gary Funck  
Date: 3/30/2022  
Subject: Draft Amendment 7

Emile,

I believe the striper fishing Draft Amendment 7 is unfair to the NY Hudson River striper fishing population. While the NYS striper fishermen keep getting squeezed by more and more regulations, most other States along the Atlantic coast line are doing very little or nothing at all. The fish we can't keep in the Hudson River can be taken in the ocean and Chesapeake area. Is this fair? Please don't think I'm against the present regulations we have. I believe they are working and I'm all for improving the striper counts. I just don't feel it is right that us NY Hudson River fishermen should have to carry the majority of the burden of preserving. I highly doubt there is a "one shoe that fits all" regulation, but all Atlantic coast states with striper seasons and estuaries should be doing something close/similar to our regulations.

One other major issue I have with the Amendment 7 is with sub options, mainly "Sub-Option B1 & B2". In this very unfortunate day and age we live in of corruptness and underhandedness in the NYS political arena, I can't help but think these options were "slipped" into the 141-page amendment to either greatly reduce or possibly even eliminate our future striper seasons on the Hudson. The "Amendment Makers" have a much better chance of buy-in from me, if they just talk straight and honest. 141 pages of muck, with a couple under the radar "sub-options" only puts me (and probably most other NY fishermen) on "HIGH ALERT".

I would urge that the time and money spent on Amendment 7 be redirected and refocused on getting buy-in and regulatory actions from other Atlantic Coast States that have striper seasons. NYS Hudson River Fishermen have more than done their part in recent years. It is time for other states to step up and do their part to conserve the striper population. And please... **PLEASE...** Keep the politics and muck out of our lakes, rivers and streams.

Sincerely,

Gary Funck

Hoosick, NY

From: [Rob Lee](#)  
To: [Comments](#)  
Subject: [External] Restrict the Use of Conservation Equivalency on stock status.  
Date: Tuesday, March 29, 2022 6:21:07 PM

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Dear ASMFC,

Welcome again and thank you for your efforts in saving our prized striped bass. I participated in a number of the sessions last year and attended the Rhode Island, New York, and Connecticut meetings via phone. Unfortunately, this year I have been on the road.

**I would like to provide my comments as listed below with the major important being to Restrict the Use of Conservation Equivalency on stock status.**

**I have bolded my most important additional points.**

*The most important thing relates to Section 4.6.2 Management Program Equivalency*

***Do not allow states the use of conservation equivalency on stock status.***

*Also Known as conservation equivalency (CE), Vote Option B: RESTRICT THE USE OF CONSERVATION EQUIVALENCY ON STOCK STATUS. Do not allow states to create their own regulations that are different from that of the Interstate Fishery Management Plan (FMP). We need to manage the fishery for abundance, we cannot allow states to have different striped bass size requirements, regulations and separate quotas.*

***Another area that I think is very important for striped bass abundance deals with safe release practices and outreach and education on it. This is found under the following:***

#### **4.4.2 Measures to address Recreational Release Mortality**

Recreational releases are fish caught and released alive during recreational fishing trips. A proportion of releases die as a result of that fishing interaction, which is referred to as release mortality (or dead releases). The number of striped bass that die after being caught and released is estimated by multiplying the total number of live releases by an estimated rate of hooking mortality. ***The stock assessment currently applies a 9% hooking mortality rate to all recreationally released striped bass.*** This does not mean that every time a fish is released alive it has a 9% chance of dying. Under some conditions, the released fish has a higher or lower probability of dying, but overall, coastwide, ***it is assumed that 9% of all striped bass released alive die.***

Each year since 2017, ***more fish were estimated to have died from catch and release fishing than were harvested by the recreational fishery.*** For example, 2.76 million fish are estimated to have died from catch and release fishing in 2020, whereas 1.71 million fish were harvested in 2020. ***90% of striped bass caught by recreational fisherman were released alive with approximately a 9% mortality rate.***

***Reminder: Do your best to safely release the fish you catch, limit the time the fish is out of the water and if you take pictures, do it fast! As guidance, the minute you land the fish,***

*hold your breath, the fish is feeling the same way out of water...*

**Option D: Outreach & Education**

*Sub-Option D2: Recommendation for states to promote best handling and release practices for striped bass through the use of developing public education and outreach campaigns. States should also require fishing tackle and fishing publications to provide a safe catch and release and fish handling information for public view and in each publication.*

*Thank you*

*Robert Lee*

*Recreational fisherman, surfcaster, board member, President of Westport Striped Bass Club*



**From:** [Tony March](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Tuesday, March 29, 2022 5:53:30 PM

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To Whom it may concern,

I am a recreational fisherman and have been so for 60 or more years. I have been listening to various people and associations as to what I should be asking the ASMFC to do to protect the Striped Bass Fishery. The following are some examples: Management Triggers support option A1, F Threshold Triggers support option B1, etc. etc. Moving on, Recruitment Triggers B2, under Tier 2 SSB Triggers support A2, on and on. Frankly speaking I don't really know. I expected an organization; your organization to do what was right to protect this fishery. I am aware of the plight of the Striped bass, Bluefish and Menhaden because I belong to a fishing club that has been in existence since 1952. The club has a long and proud record of supporting conservation efforts.

**What I do know is this, since the club's founding in 1952 and the present day 75% of what was in the ocean is gone!**

**I also believe that practicing sustainable harvesting will bring this trend to an end.**

Before your heads hit the pillow this evening ask yourselves If you can be the solution. I am sure that if you only consider the fishery you will make the correct decisions to protect it.

Thanking you in advance,

Anthony Marchisotto  
659 Hawkins Rd. E.  
Coram, NY 11727

**From:** [G2W](#)  
**To:** [Comments](#)  
**Cc:** [Emilie Franke](#)  
**Subject:** Fw: [External] Striped Bass Amendment Hearings  
**Date:** Tuesday, March 29, 2022 4:39:15 PM

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**From:** Ron Prestwich <jronprestwich@gmail.com>  
**Sent:** Tuesday, March 29, 2022 3:24 PM  
**To:** G2W  
**Subject:** [External] Striped Bass Amendment Hearings

Was able to listen to most of the Maryland webinar yesterday but had to leave before conclusion. One comment. Not sure if you have any regulatory power about this but a friend was on the Nanticoke river last year in April. A tug boat pushing a barge came thru and literally left dozens of dead stripped bass cows in its wake....cut by its prop. This one trip did alot of damage to the reproducing female stock. If you can, consider limiting large vessel traffic thru these shallow water areas during the spawn.

Sent from my iPhone

**From:** [John Bartolo](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass PID  
**Date:** Tuesday, March 29, 2022 4:10:41 PM

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To who it may concern,

I am writing to you to let you know that the striped bass to me should be managed for abundance and not for maximum profit. I am a recreational angler with young kids and the value of the bass to us, is being able to catch and release them each year. We spend money at the tackle/fly shop, the grocery store and may restaurants while there. Not to mention all the clothes and gear bought to supprt this hobby. We are local members of the Plumb Island Surfcasters and American Saltwater Guides Association and support their views on the amendment. Thank you for your time .

John Bartolo

**From:** [M Kelley](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Tuesday, March 29, 2022 2:37:22 PM

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Greetings,

My name is Michael Kelley and I am a recreational angler passionate for targeting, catching, and releasing Striped Bass. Over my angling career I have seen many different changes to the striped bass size and bag limits. Now more than ever these fish are in trouble, throughout the entire upper East coast.

We must act now to save the future of this fishery.

Below are my stances on Amendment 7:

Tier 1:

I support sub-option A1.  
I support sub-option B1. (Status Quo)  
I support option C1. (Status Quo)

Tier 2:

SSB Triggers  
I support sub-option A2.  
SSB Threshold Triggers  
I support sub-option B1.  
SSB Target Triggers  
I support sub-option C1.

Tier 3:

Recruitment Triggers  
Definitions.  
I support sub-option A2.  
Management Response  
I support sub-option B2.

Tier 4:

Deferred Management Action  
I support option A.  
No deferred management action!  
We can not delay management any longer!

Striped bass are a fish prized by catch and release anglers for sport and must be treated as such.

Option C:

4.2.2 measures to address rec. release mortality  
I support sub-option C1.  
I support sub-option C2.

Option D:

Outreach and Education  
I support sub-option D2.  
Continue to promote proper handling and release practices.

4.4.2 rebuilding

I support option B

4.6.2 management

I support option B1-a

I support sub-option C3.

I support sub-option D2.

I support sub-option E2.

Thank you.

Sent from my iPhone

**From:** [Robert Yagid](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, March 29, 2022 2:24:16 PM

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To the Atlantic States Marine Fisheries Commission Striped Bass Board,

I grew up fishing for striped bass with my family on the New England coast after the moratorium of the 1980's. I was fortunate to see a healthy striped bass fishery throughout the 1990's. I spent every Fall chasing migrating stripers on the Cape's outer beaches. Though I didn't know it at the time, I would soon be drawn into pursuits and a fishery in steady decline. Over the past 20 years, the fall fishery on the Cape and elsewhere on the East Coast has become a ghost of what it once was. The impacts are far reaching. The opportunity is so diminished, that our family no longer fishes our once treasured locations in the Fall. Motels are empty, whose parking lots were once laden in the off season with beach buggies. Tackle shops are shuttered. Custom rod makers are long gone. The outdoor recreation economy up and down the coast has suffered in parallel to the health of the fishery. Stripers are an important fish species to those who chase them, like me and my family, and the businesses and communities who thrive on the economic opportunity they support. It's why Draft Amendment 7 is so important, and I appreciate the opportunity to express some of the specific options I would like to see included in Amendment 7.

Currently, striped bass are at overfished levels because excessive overfishing has been allowed, and ASMFC has unfortunately failed to take proactive measures--some prescribed by their own mandate--to support the recovery and the health of the fishery. To help reverse this trend, I'd like to see the following options included and priorities in Amendment 7:

#### 4.1 Management Triggers

Tier 1 - A1, B1, C1

Tier 2 - A2, B1, C2

Tier 3 - A2, B2

Tier 4 - A

#### 4.2.2 Recreational Release Mortality

Sub-Options C1, C2, D2

#### 4.4 Rebuilding Plan

4.4.1 Option B

4.4.2 Option B

#### 4.6.2 Management Program Equivalency

Sub-options B1-a, C3, D2, E2

The ASMFC has the aptitude and opportunity to reverse the trajectory of its management success of America's fisheries. I strongly encourage you to implement management plans via

Amendment 7 that ensure the long-term recovery and health of Striped Bass. Thank you for your time, and your personal commitment to this important work.

Best,

Rob  
Collinsville, CT

**From:** [Gary Sottosanti](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, March 29, 2022 9:41:30 AM

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**TO:** Emilie Franke, FMP Coordinator, AFMSC  
[Comments@asmfc.org](mailto:Comments@asmfc.org)

**From:** Captain Gary Sottosanti  
808 Clarksville Rd. South  
Feura Bush, NY 12067  
518-495-8078  
[garsot1951@yahoo.com](mailto:garsot1951@yahoo.com)

I listened to the Webinar on 3/23/22 from NYSDEC--- New Paltz, NY.....

My Comments:

- 1... Way to technical for the average Joe....We are fisherman not Statistic Professors
- 2...If we are restricted to 18" to 28" above the GW Bridge....MAKE IT 18" to 28" everywhere...including the coastal and salt water areas....  
Why should someone below the GW Bridge be allowed to keep fish we must throw back.....If the 18"to 28" slot cannot be adopted all over....At the very least change the Hudson River regulation The George Washington Bridge reg makes no sense.... The cut off line should be the Verrazano Bridge in the Upper Bay , the Goethals Bridge in the Arthur Kill// Kill van Kull and the Throggs Neck Bridge on the East River // Long Island Sound .....
- 3...Circle Hooks now required when bait fishing ...however artificials with trebles are still allowed... large jigs are essentially a barbed J hook ...
- 4...Educate the Public on proper handling and release efforts....(ie NYSDEC education through Webinars or Meetings)
- 5...More enforcement is needed ....Many areas downstate have seen large groups of non English speaking residents taking fish of all sizes  
(probably not following the circle hook rule either )

Sincerely,

Captain Gary Sottosanti  
Master 1600 Ton- Coastwise  
First Class Pilot - Unlimited Tonnage - Hudson River - The Battery to Albany  
Third Mate Oceans - Unlimited Tonnage



**From:** [Benjamin Gallahue](#)  
**To:** [Comments](#)  
**Cc:** [Stripercomments@gmail.com](mailto:Stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Monday, March 28, 2022 9:35:08 PM

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Hello,

Here are my comments on Amendment 7. I have commented on the issues that I believe are important, and left the more simple ones as just my chosen option. I look forward to the NH meeting tomorrow, and hope we can make concrete change that will help the Striped Bass fishery stay healthy long into the future.

#### **4.1: Management Triggers**

##### *Tier 1: Fishing Mortality Triggers*

Option A - Sub-option A1

Option B - Sub-option B1

Option C - Sub-option C1

- Shortest possible time to action on all!

##### *Tier 2: SSB Triggers*

Option A - Sub-option A2

Option B - Sub-option B1

Option C - Sub-option C1

- Once again shortest possible time to action for all!

##### *Tier 3: Recruitment Triggers*

Option A - Sub-option A2

- The board needs to operate with more caution moving forward, and option A2 is a realistic yet more sensitive trigger.

Option B - Sub-option B2

- The board has failed to respond until there was several years of poor year classes. This needs to change, and the board needs to be more aware of overall trends, not just when recruitment starts to plummet.

##### *Tier 4: Deferred Management Action*

Option A

- No deferred management action. Given the current state of the fishery, overfished with overfishing occurring, allowing flexibility to defer action simply does not make sense. If a trigger is tripped, then action needs to be taken ASAP.

#### **4.2: Recreational Fishery Management Measures**

##### 4.2.2: Measures to Address Recreational Release Mortality

##### *Option B: Effort Controls*

Sub-option B2

Sub-option B2-b

- Allows the best protection for the SSB while they spawn. A minimum two-week period is almost necessary for any species, and does not impact the recreational and commercial fishing season as much. This should be a bare minimum regulation considering the stock is currently

overfished with overfishing occurring.

*Option C: Additional Gear Restrictions*

Sub-option C1

Sub-option C2

*Option D: Outreach and Education*

Sub-option D1

- Option D2 only recommends that “states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns”. This should not be a recommendation, but a requirement. Education is the key to minimizing recreational release mortality!

**4.4: Rebuilding Plan**

*4.4.1: Recruitment Assumption for Rebuilding Calculation*

Option B

*4.4.2: Rebuilding Plan Framework*

Option B

**4.6: Alternate State Management Regimes**

*4.6.2: Management Program Equivalency*

Option B

Sub-option B1-a

- The TC has stated that the implementation of CE in the management process is unquantifiable and will likely cloud the regulations put in place by states to reach the overall reductions necessary. Provides the most limitations to the use of CE by states, some of whom have taken advantage of it. The stock needs to be managed for abundance and the commission needs to know that CE has no place in a stock that is overfished with overfishing occurring.

Option C

Sub-option C3

Option D

Sub-option D3

Option E

Sub-option E2

**From:** [Greg Cahill](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7  
**Date:** Monday, March 28, 2022 7:31:49 PM

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I am a recreational fisher of over 50 years fishing for striped bass. It is my favorite fish for many reasons and I am saddened by its current plight. It is my opinion that we must do everything we can right now to restore the stocks to a healthy and sustainable level in the quickest way possible.

In order to more quickly accomplish the rebuilding of the stock I would like to see the following options selected:

Fishing Mortality Triggers

Option A - suboption A1

Option B - suboption B1

Option C - suboption C1

Spawning Stock Biomass Triggers

Option A - suboption A1

Option B - suboption B1

Option C - suboption C1

Recruitment Trigger

Option A - suboption A2

Option B - suboption B2

Deferred Management Action

Option A

Recreational Release Mortality

I would support Suboption C1 and C2 and D2

Rebuilding Plan

I support option B for Recruitment Assumption and option B for Rebuilding Plan

Conservation Equivalency

I support Option B1-a

Option C3

Option D2

Option E2

Thank you for allowing me to participate in the process to protect striped bass. I appreciate the work that has been put into this amendment and I hope the outcome will be a healthy restored stock of striped bass.

Greg Cahill



**From:** [Donald Ives](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 for New Jersey  
**Date:** Monday, March 28, 2022 6:52:16 PM

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Upon further review I support  
Option B which would hopefully close the entire Delaware River and upper Delaware Bay during spring spawning  
season until June 1, I have witnessed in my lifetime, and I am 67 years young over harvesting of Striped Bass in  
Elsinboro Twp, Salem County  
Sincerely yours  
Don Ives

Sent from my iPhone

**From:** [Bella Perrino](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7 of the Atlantic Striped Bass Fishery Management Plan  
**Date:** Monday, March 28, 2022 4:57:47 PM

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Dear ASMFC Commissioners,

As a woman angler, I am concerned with the state of striped bass fishing. I have fished for stripers since childhood and have the scars from fillet knives and imbedded hooks to show for it. Most importantly, striper fishing is a passion not just for myself, but for so many of my family members and those in my community. But now, there are few fish around. I am concerned that your group has been reckless in managing striped bass despite witnessing the deterioration of fishing over the past several years. As the group responsible for fish management, it is paramount that you be much more conservative in your regulations and put the fish first. I also would like to see more women on your commission; perhaps they would be more careful with the fish and not kill so many. I have listed below my votes for options related to Amendment 7:

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, I believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically,

- Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level
- Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates
- Option D3, which would require an uncertainty buffer of 50% for proposed CE programs for non-quota-managed fisheries
- Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

On 4.1 Management Triggers,

- Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality
- Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold
- Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions
- Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

#### 4.2 Recreational Fishery Management Measures

- Option B Seasonal Closures:
- -Sub-option B2-b. No-Targeting Spawning Closure Required: All recreational targeting of striped bass would be prohibited for a minimum two-week period on all spawning grounds (not necessarily the entire spawning area) during Wave 2 (March-April) or Wave 3 (May-June), as determined by states to align with peak spawning. States will determine the boundaries of spawning ground closures. Closures prohibiting

recreational targeting on spawning grounds have already been implemented in Maine (Kennebec River), New Jersey (Delaware River), and Maryland (Chesapeake Bay) during part of Wave 2 and/or Wave 3.

On 4.2.2 Measures to Address Recreational Release Mortality,

- Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method
- Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation,

- Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. I recognize this option may require more restrictive management measures than option A, which I support

On 4.4.2 Rebuilding Plan Framework,

- Option B to allow the Board to take direct management actions as III as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

Sincerely,

Isabella Perrino  
903 Parkview Drive  
Apt A211  
King of Prussia, PA  
19406

**From:** [Bill O'Boyle](#)  
**To:** [Comments](#)  
**Cc:** [Bill O'Boyle](#)  
**Subject:** [External] Draft Amendment  
**Date:** Monday, March 28, 2022 3:49:19 PM

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ASMFC,

My name is William F. O'Boyle, I live in Sag Harbor area, NY.

I fish for Striped Bass locally as well as other fish, I have been fishing here for over forty years.

I'm in favor of the most reasonable triggers that protect the present and future stocks of Striped Bass possible. Please consider implementing legislation immediately to protect this valuable resource for all of us wheaten we fish or do not fish.

I'm happy to participate in any survey you think would help inform legislation.

Sincerely,

William F. O'Boyle

Sent from my iPhone



**From:** [Christian Moscicki](#)  
**To:** [Comments](#)  
**Cc:** [cmoscick](#)  
**Subject:** [External] Submitting Comments for Striped Bass Amendment 7  
**Date:** Monday, March 28, 2022 2:47:44 PM

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To the Committee: Thank you for your continued efforts on behalf of our beloved striped bass fishery. My name is Christian Moscicki and I have been surfcasting for striped bass from the south shore of Long Island for over 15 years. I have witnessed a significant and marked reduction in the numbers of large striped bass over this period of fishing.

Before I provide specific feedback on the measures included, I would like to make several brief points.

- **Please do not modify the benchmarks or baselines.** We should not be permitted to redefine the set of acceptable standards based on what is convenient to some constituents. Please do not consider any measures that would decrease our population targets; moving this line could trigger a long-term cascade resulting in the ultimate demise of the striped bass fishery.
- I believe policing and enforcement are at least as important as the ultimate statutes. I would encourage the committee to focus on enforceable statutes and continue to take any available measures to see that the enforcement arm is as effective as possible.
- I am strongly in favor of banning the use of gaffs.
- I would encourage the committee to consider banning the use of any bait whatsoever (rigged or live) for the fishing of striped bass. At the very least, I would encourage the committee to further explore and fund impact studies to better understand what potential impacts from such a change might be.
- Please hold the states with spawning areas accountable. I am in favor of completely closing all striped bass spawning areas to the harvest and targeting of striped bass (catch and release included). We must protect these large fish when they are at their most vulnerable. I am in favor of both 4 B2-a and 4 B2-b to protect the spawning grounds.
- Please ensure equal enforcement for all states and stop letting individual states argue for special treatment or reasons the rules should not be interpreted differently. Please ensure rules are incorporated with their intended purpose in mind (i.e., if enacted, do not let New Jersey advocate that its 2-week pause comes in December).
- Please consider subsequent efforts that ban the use of gillnets to harvest striped bass.

My specific comments on individual questions in Amendment 7 are as follows:

4.1

- Tier 1
  - o Option A- Support A1

- Option B- Support B1
  - Option C- Support C1
- Tier 2
  - Option A- Support A2
  - Option B- Support B1
  - Option C- Support C1
- Tier 3
  - Option A- Support A3
  - Option B- Support B2
- Tier 4
  - Support A

#### 4.2

- Do not support Sub Option B1 – Do not support; **these criteria would allow New Jersey, for example, to take its 2 week pause very late in the very season, far after the intended purpose of the measure would address.**
- **SUPPORT Sub Option B2 (BOTH) A and B – I am in favor of implementing both measures B2-a and B2-b.**
- Option C- Support C1, C2
- Option D- Support D1

#### 4.4.1

- Support B

#### 4.4.2

- Support B

#### 4.6.2

- Option B- Support B1-a
- Option C- Support C3
- Option D- Support D3
- Option E- Support E2

Thank you again for your continued efforts!

Sincerely,

Christian Moscicki

East Quogue, New York, 11942

**From:** [noah cluster](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass  
**Date:** Monday, March 28, 2022 12:59:32 PM

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If you want to save the taxpayers money then simply place a moratorium on all Striped Bass until the spawn improves. You keep waiting for a super spawn that may never come and depleting the biomass. I have personally advocated a eastern coast gamefish only status since the 1970s. Pay off the waterman and have them retrained to fix computers or something maybe go into pig or cattle farming. If we can't domesticate fish and we can't control their natural spawn them stop fishing for them.

Sent from [Mail](#) for Windows

**From:** [Jeremy Foss](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Monday, March 28, 2022 12:10:06 PM

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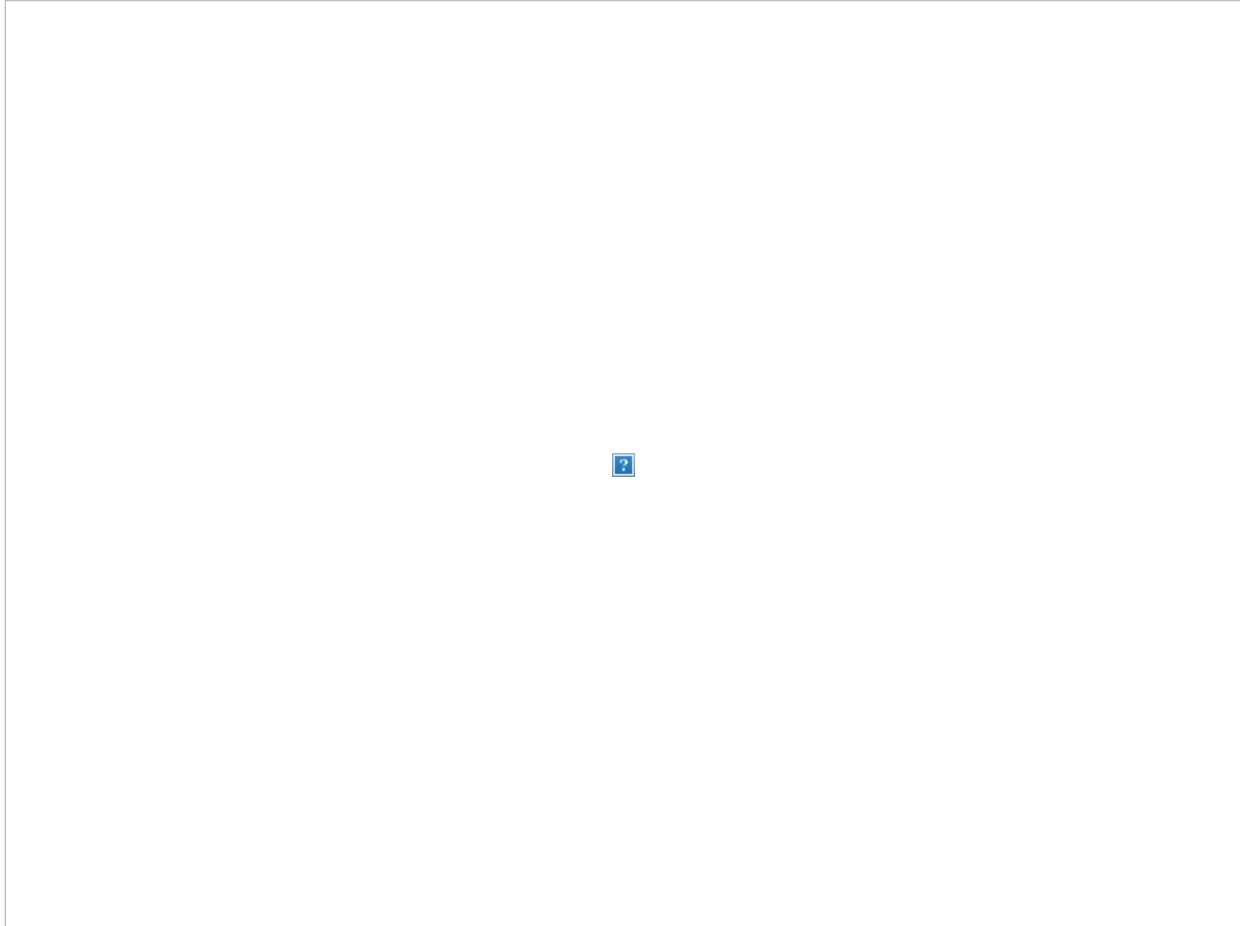
Sent from my iPhone As a local FlyFisher, flytyer and catch & release fisherman I'm asking you to do all you can to save the Striped Bass and educate our fellow fisherman on preserving this species for a better future. From April to November this fish is why I live, from tying flies into the late hours of the night, so days and nights can be spent fishing for this beautiful species I so admire. I'd be lost without our Striped Bass fishery as would many of my fellow fly anglers. Please help, your friend Jeremy Foss

**From:** [Phil Zalesak](#)  
**To:** [Comments](#)  
**Cc:** [MICHAEL LUJISI](#); [Colin Sweetin -GOVOffice-](#); [Edward Burchell](#); [Bert Olmstead](#); [Allen Seigel](#); [Chris Linnetty](#); [Jim Cappetta](#); [Kevin McMenamin](#); [Mark Kurth](#); [Robert Fair](#); [Ron Smith](#); [Skip Zinck](#); [Stanley Cebula](#); [Tom Wilkinson](#); [Mel Bell](#); [Robert Beal](#); [Toni Kerns](#); [Senator Jack Bailey](#); [Brian Crosby](#); [wsckeeper@gmail.com](#); [steveatkinson52@verizon.net](#); [dunnsville@gmail.com](#); [Capt Chris Dollar](#); [Jamie RileyKolsky@washpost.com](#); [jeannie.riccio@maryland.gov](#); [Lenny@fishtalkmag.com](#); [MICHAEL ACADFMIA](#); [noahbressman@gmail.com](#); [DAVID SECOR](#); [bdwatt@wm.edu](#); [capletts@capgaznews.com](#); [mpluta@shorerivers.org](#); [josh.tulkin@mdsierra.org](#); [PHILIP ZALESAK](#)  
**Subject:** [External] UPDATE TO PUBLIC COMMENT OF PHIL ZALESAK REGARDING DRAFT AMENDMENT 7 STRIPED BASS FISHERY MANAGEMENT PLAN  
**Date:** Monday, March 28, 2022 11:56:07 AM

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Atlantic States Marine Fisheries Commission Staff,

Maryland's official state fish is in poor condition. The **total recreational harvest of striped bass in the Chesapeake Bay has declined by 62% from 2006 to 2020 from 2,094,900 fish to 787,000 fish** (green line). This is due in part to overharvesting a critical forage fish, Atlantic menhaden, in Virginia waters by the last remaining industrial reduction fishery on the Atlantic Coast. Striped bass rely on Atlantic menhaden for their survival.



The Atlantic Menhaden Management Board has a special responsibility to protect predator fish such as striped bass, bluefish, and weakfish which are dependent on Atlantic menhaden as forage fish for their survival.

The science supporting this position is in the Ecological Reference Points Stock Assessment Report dated January 2020 on page iii of [http://www.asmfc.org/uploads/file/5e4c4064AtlMenhadenERPAssmt\\_PeerReviewReports.pdf](http://www.asmfc.org/uploads/file/5e4c4064AtlMenhadenERPAssmt_PeerReviewReports.pdf)

Here's a direct quote from an ASMFC press release of October 20, 2020:

**“The 2021-2022 TAC was set based on the ecological reference points (ERPs) approved by the Board in August, and reaffirms the Board’s commitment to manage the fishery in a way that accounts for the species role as a forage fish.”**

Currently the DRAFT Amendment 7 for Striped Bass fishery management plan is out for Public Comment; however, there is nothing in this document which reflects this commitment to protecting the survival of striped bass. Here's a direct quote from page 7 from that document:

**“These ERPs allow ASMFC to take into account menhaden’s role as a forage fish, especially its importance to striped bass, when setting harvest limits for menhaden. However, the biological reference points for striped bass are still set using single-species modeling. ASMFC is working on refining the ERP model and improving the understanding of the role of striped bass in the**

**ecosystem beyond the relationship with menhaden.”**

The Atlantic Menhaden Management Board needs to **assess** prohibiting the commercial reduction fishing of Atlantic menhaden in the Virginia waters as soon as possible. The assessment needs to be **completed by July 15, 2022** to allow lead time for implementation in 2023 should that be necessary.

I respectfully request that you put this on the agenda for the upcoming May meeting.

Further, I request that I be given 10 minutes to address this issue at the May meeting.

Why an assessment?

There is no science which supports removing over 51,000 metric tons of Atlantic menhaden from the Virginia portion of the Chesapeake Bay . . . [http://www.asmfc.org/uploads/file//5a4c02e1AtlanticMenhadenAmendment3\\_Nov2017.pdf](http://www.asmfc.org/uploads/file//5a4c02e1AtlanticMenhadenAmendment3_Nov2017.pdf), page v. This quota represents over 26% of the total allowable catch for the entire Atlantic Coast of 194,000 metric tons . . .

<http://www.asmfc.org/uploads/file/5f8f5e30pr23AtlMenhaden2021-2022TAC.pdf>

If you have any questions, please contact me at your earliest convenience.

Thank you for your time and consideration.

Phil Zalesak (240-538-3626)

President

Southern Maryland Recreational Fishing Organization

[www.smrfo.org](http://www.smrfo.org)

<https://www.facebook.com/groups/598428253621775/>

**From:** [Albert Perrino](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Monday, March 28, 2022 10:24:01 AM

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RE: Draft Amendment 7

The necessity for immediate action to prevent another collapse of the striped fishery is clearly unequivocal. I say necessity because of the sport fishing repercussions and the economic impact sport fishing provides coast wide. I say another because I personally experienced the collapse in the 1970's and 80s. And I say unequivocal because the circumstances are essentially the same as then with overfishing and unwillingness to accept what was happening to the fishery having resulted in delay in undertaking the requisite reforms. We have much more data and information available on the fishery now than we did 50 years ago and this must allow a response that is more timely and based on the facts rather than optimistic guesses and political/commercial influences.

I therefore recommend the following vis-à-vis the proposals in the Draft Amendment 7 of the Atlantic Striped Bass Fishery Management Plan, particularly with respect to 4.1 Management Triggers and 4.6.2, the Conservation Equivalency (CE), which appears to represent a loophole for individual states to avoid the necessary reductions in striped bass mortality targets set by the ASMFC.

On

4.1 Management Triggers, I support:

- Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality
- Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold
- Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions
- Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, I support:

- Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method
- Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, I support:

- Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. I

recognize this option may require more restrictive management measures than option A, which I support

On 4.4.2 Rebuilding Plan Framework, I support:

- Option B to allow the Board to take direct management actions as III as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, “Management program equivalency (also known as “conservation equivalency” or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

I believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically, I support:

- Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level
- Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates
- Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries
- Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

Thank you for allowing me to partake in the management process of this prized sport fishery,

Dr. Albert C. Perrino, Sr

729 Taunton Rd

Wilmington, DE 19803

Sent from my iPad



**From:** [Jeff Helmuth](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Monday, March 28, 2022 10:20:57 AM

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Regarding the Release Mortality Trigger - We need to reduce the number of "Hooks in the Water" In 2011, NY increased the number of fishing rods that could be tended in freshwater from 2 to 3 for each fisherman. This should be reduced in the following manner (for Striper fishing only) - reducing the number of fishing rods allowed to be tended reduces the number of targeted hooks at least 33% and in some cases more...

- For boat fishing: When fishing alone, two (2) fishing rods for a lone person actively tended. When more than one person is on the boat, one (1) fishing rod per person actively tended.
- For fishing from shore: two (2) rods per person only.

**Example:** Captain and four (4) fishermen on one boat: Captain can use one (1) rod and the remaining four fishermen can use one (1) rod each for a total of five (5) rods **regardless of fishing at anchor with natural bait or trolling** - under existing rules 15 rods would be allowed! - so this represents a 66% decrease in targeting yet allows fishing.

- Fishing tournaments and Fishing derbies with cash or other prizes should be disallowed.
- When spawning pods are observed, boats at anchor within the pods must stay at anchor and terminate fishing activities - all other boats to remain at least 300 yards outside the pod area perimeter (this prevents trollers from passing through the pod spawning area actively fishing which has been observed many times in the past)

Thank you - Jeff Helmuth, Saugerties, NY

**From:** [Juli Perrino](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7 of the Atlantic Striped Bass Fishery Management Plan  
**Date:** Monday, March 28, 2022 10:13:26 AM

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Date: March 28, 2022

Subject: ASMFC Draft Amendment 7

Dear ASMFC Commissioners,

I am a woman recreational angler writing with my concerns of this commission's management of striped bass. My passion for fishing started in childhood with my father taking me and our family striper fishing throughout New England. Whether trips from our home in Connecticut or on family vacations to fishing hot spots like Martha's Vineyard or Watch Hill, striper fishing on the beaches, kayak, or boat was a great time. It is one of the reasons I decided to stay in New England (I currently work in Massachusetts) but I am now questioning this decision. Currently the fishing pales in comparison to that of two decades ago and I worry that the recreational fishing I enjoyed growing up will not be available for me and my children. I have learned that the ASMFC is entrusted to manage the stripers but that there is only a fraction of the fish that was around just two decades ago. This is sad to see and I would like to see more stringent conservation measures for the Striped Bass. I am sharing with you my suggestions on options related to Draft Amendment 7 which offer the best options to improve this situation.

On 4.1 Management Triggers, I support:

- Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality
- Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold
- Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions
- Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, I support:

- Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method
- Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, I support:

- Option B to use the more realistic and conservative low recruitment regime

assumptions to rebuild female SSB target levels no later than 2029. I recognize this option may require more restrictive management measures than option A, which I support

On 4.4.2 Rebuilding Plan Framework, I support:

- Option B to allow the Board to take direct management actions as III as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, “Management program equivalency (also known as “conservation equivalency” or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

I believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically, I support:

- Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level
- Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates
- Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries
- Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

Sincerely,

Juliana Perrino

140 Commonwealth Avenue

Chestnut Hill, MA 02467

**From:** [David Perrino](#)  
**To:** [Comments](#)  
**Subject:** [External] Striper Management  
**Date:** Monday, March 28, 2022 8:50:58 AM

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To ASMFC and all whom it **should** concern:

I was born in Rhode Island and still travel each summer, as I have for decades, back to New England to rent vacation property, fish, and patronize the many businesses including restaurants, retail stores and restaurants, just to name a few.

Striped bass fishing has been a major determinant factor for me, my family and many friends; all of whom travel to New England each year.

I am writing to share that I am deeply concerned about the approach ASMFC has taken to repopulate the stock of Striped Bass.

Over the years we have noticed the number and size of Stripers have significantly deteriorated throughout New England. It is clear that your own data supports this position. It is apparent that your reckless management has failed to protect this unique and economically important resource - the prized striped bass fishery.

I am at the age where we are deciding upon the next phase in our lives with respect to retirement and where that will happen. We are now seriously looking at Florida instead of Rhode Island. The degradation of and reduced quality of fishing is a driving factor in this decision.

Now is the time to change your course in order to have any chance to save this fishery for all of us. With that being said, I implore you to take action immediately on the following amendments.

On 4.1 Management Triggers, I support:

- Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality
- Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold
- Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions
- Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, I support:

- Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method
- Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, I support:

- Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. I recognize this option may require more restrictive management measures than option A, which I support

On 4.4.2 Rebuilding Plan Framework, I support:

- Option B to allow the Board to take direct management actions as III as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, “Management program equivalency (also known as “conservation equivalency” or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

I believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically, I support:

- Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level
- Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates
- Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries
- Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

Sincerely,

David M. Perrino

Dave Perrino

**From:** [G Cove](#)  
**To:** [Comments](#)  
**Cc:** [stripercomment@gmail.com](mailto:stripercomment@gmail.com)  
**Subject:** [External] Draft amendment 7  
**Date:** Sunday, March 27, 2022 9:27:36 PM

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To Whom it may Concern,

Hello, I am a full time Charter Captain and lifelong saltwater angler in the state of Maine. I am a member of Maine Association of Charter Captains and a striped bass enthusiast. I wanted to express my support for the position of ASGA in regards to amendment 7.

Striped Bass deserve to be looked at only as a sport fish, as it is the only thrilling fish we have available in season to catch. People of all abilities and walks of life are able to target these fish. What I have seen on my boats- a disabled Veteran in a wheelchair, vision impaired anglers, working class families, professional athletes and celebrities, the one constant is that smile on their face when they hold a striper in their hands. With a decent body of fish people are able to go to their local estuary, river or ocean shoreline to sport fish. It is beyond comprehension how important this striper fishery is to our Seacoast area. The economic engine alone because of the pursuit of these fish by young and old, skilled and unskilled anglers is something that is very important to Southern Maine.

It was exciting as a young angler to see the striper fishery rebound from the late 80's and peaking in the mid to late 90's. It was some of the best fishing I have seen in my lifetime. Unfortunately since the late 90's we have seen a steady decline. It is more than overdue to correct this problem and get back to something I once experienced.

Thank you for your time and attention,

Sincerely

Captain Greg Brown  
G Cove Charters LLC

Captain Greg Brown

**From:** [r f](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass comments  
**Date:** Sunday, March 27, 2022 8:30:43 PM

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Dear ASMFC,

I know its not easy to manage a fishery that extends from Maine to Florida. Never mind the striped bass that live in Canada.

With that said I want to add my own few words to the subject. I live in Monmouth County NJ- I fish for Stripers with a fly rod from Keyport to LBI with most fishing done from Sandy Hook to Deal NJ, plus the 2 rivers of Navisink and Shrewsbury. I have been fishing for close to 40 years now, with the last 25 with the fly rod. My wife is from Connecticut so I used to fish with her Uncles in places like Housitonic River, West Port, Black Rock etc and we made runs up to Rhode Island for Westerly, Narraganset. When I lived in Manhattan I fished the East River, Hudson River and City Island, but that was in my spin rod days. I love to fish, love being outside, the sand, salt water and being with other people who fish. Naturally Striped Bass are the fish of choice although I like when Blue Fish flash in. In those 40 years Striped Bass have been plentiful at times and other times one worked hard for every fish. They have at times been mostly big, well over 30 inches to times when a 30 inch fish is a unicorn. NJ once had a 36 inch limit, then had slot limit of 24-28 with one bonus fish if it was very big, I forgot the exact size and now has 2 at 28 inches. I have killed a few Striped Bass in my life, I like to eat fish and they taste good when they are small, like around 22-24 inches. Once they get big they taste like rubber, so a slot limit of 22 to 26 inches or so would be a idea to consider. I do not know how the vote will go but I can tell you the Striped Bass are in a decline. Sometime about 10-12 years ago the spring fishing got way better then the fall fishing. Bigger fish and more of them in the spring, and way less bliz of fish in the fall, and those fish were smaller. As someone who spends way to much time and loses way to much sleep from fishing at night, as alleged by my wife, I wish that the ASMFC limits the amount of fish taken, whether by recitational or commercial means, by at least 40 percent over the next 3 years and see where the fishery is in 3 years. Personally I would be good on no fish taken but that may be to extrem to do. I have 3 sons who now fish with me or by themselves and I hope, wish and pray that one day they also can teach their sons or daughters, my 2 daughters had no interest no matter how hard i tired, to also fish and come to love salt water fishing for stripers. A few more C/O's on the beach checking at night would also help. Burns my ass when I see shorts or extra fish taken, hidden in bushes, car trunks etc. NJ C/O's are good and do respond but they are so few for all the area that needs to be enforced.

Thank you,

Robert Fitzsimmons  
Monmouth County NJ.

**From:** [Dan Ursini](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7 of the Atlantic Striped Bass Fishery Management Plan  
**Date:** Sunday, March 27, 2022 6:05:29 PM

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In this letter, I provide my recommendations to the commission on Draft Amendment 7 of the Atlantic Striped Bass Fishery Management Plan with the goals of not only rebuilding this once prized fishery but rebuilding the integrity of the ASMFC as well.

4.6.2 Conservation Equivalency (CE): Let me begin by addressing, CE, one of the key tools that has been weaponized by some member states to subvert ASMFC's fisheries management. Specifically, CE has been used as a conservation loophole by individual states with the result being failure to meet even the inadequate reductions in fishing mortality rate targets set by ASMFC and further depletion of the stock. New Jersey's CE in Amendment 6 is just the latest example of harmful use of CE and illustrates both the hazards (i.e. increased risk) and low predictability (i.e. high uncertainty) inherent with the use of state specific CE formulas. As such, the following options are amongst the most important for the commission to address excessive fishing mortality in Draft Amendment 7. I strongly advise the commissioners to adopt:

-Sub-option B1. Restrictions: CE programs would not be approved when Sub-option B1-a: the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

-Sub-option C3: CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30.

-Sub-option D3: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 50%.

- Sub-option E2: Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state-specific level.

4.1 Management Triggers: The years of failure of the ASMFC to meet needed mortality reductions and the resulting low biomass of fish and



spawning stock requires aggressive management triggers to avoid catastrophe and assure 'in time' reductions in excessive fishing mortality. I strongly advise the commission adopt the following sub-options under Option A:

-Sub-option A1 (status quo): Reduce F to a level that is at or below the target within one year.

-Sub-option B1 (status quo): If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

-Sub-option C1 (status quo): If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

-Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. A management trigger is not considered tripped until the Board formally reviews and accepts, if necessary, the results of the relevant stock assessment.

Option B: SSB Threshold Triggers: Without a strong SSB there can be no consistent reproduction to rebuild and sustain this prized fishery. Yet, the ASFMC has been unable to achieve even this most fundamental objective, in part, due to its repeated poor management practices. Adoption of the following options best address a foundational element of prudent stock management, that being the safeguarding of a strong SSB.

-Sub-option B1 (status quo): If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

-Sub-option C1 (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

Tier 3 Options: Recruitment is an essential element of rebuilding and maintaining the stock. The JAI provides a valuable tool for managing striped bass that is independent of overall stock biomass assessments. Let me provide an example. Some fishers have claimed the striped bass stock has moved "off shore" and we are

underestimating the stock biomass and should let the killing continue. However, all spawning fish must return to very limited breeding areas, primarily the Chesapeake Bay and Hudson River, to reproduce. The low JAI and young of the year indices of recent years provides additional strong evidence that the SSB is not sufficient for a healthy stock and that claims of “redistributed” biomass are either fanciful, anecdotal, or irrelevant. We must include strong reproduction, *per se*, as a key, independent, metric of the management plan. As such, the commission is required to adopt the following more sensitive triggers regarding low recruitment and preclude the excessively risky models which have led to the tragic management results we are currently facing:

-Option A -Sub-option A3: The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model (NY, NJ, MD, VA) shows an index value that is below the median of all values in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years. The high recruitment reference period used for this trigger may be adjusted as recommended by the TC during benchmark stock assessments. This trigger alternative has a higher sensitivity than both the status quo trigger and sub-option A2.

-Option B- Sub-option B2. If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

Tier 4 Options: Inaction or deferring action when a management trigger is tripped is the hallmark of ineffective management and an example of another management failing that has plagued this commission. Accordingly, I advise:

-Option A (status quo): No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

#### 4.2 Recreational Fishery Management Measures

Option B Seasonal Closures: Allowing anglers to target fish, including catch and release, on their spawning grounds or areas where they congregate prior to spawning is both unsporting and unhelpful to the reproduction critical to rebuilding and maintaining

stock biomass. Given the low recruitment we face, this practice cannot be supported. I advise:

-Sub-option B2-b. No-Targeting Spawning Closure Required: All recreational targeting of striped bass would be prohibited for a minimum two-week period on all spawning grounds (not necessarily the entire spawning area) during Wave 2 (March-April) or Wave 3 (May-June), as determined by states to align with peak spawning. States will determine the boundaries of spawning ground closures. Closures prohibiting recreational targeting on spawning grounds have already been implemented in Maine (Kennebec River), New Jersey (Delaware River), and Maryland (Chesapeake Bay) during part of Wave 2 and/or Wave 3.

Option C: Gear Restrictions: I fully support the following measures which limit unnecessary catch and release mortality as listed below:

-Sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

-Sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

Option D: Education: I support state supported angler education to reduce unnecessary catch and release mortality as below:

-Sub-option D1: States would be required to promote best striped bass handling and release practices by developing public education and outreach campaigns. States must provide updates on public education and outreach efforts in annual state compliance reports.

#### 4.4 Rebuilding Plan

4.4.1 Recruitment Assumption: Young of year over the past 3 years has been well below average. I advise Option B which bases the rebuild of stock on a recruitment assumption that is more realistic with these poor year classes and will achieve a lower level of removals and appropriate restrictive management measures as opposed to the more suspect and highly risky options.

-Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

4.4.2 Rebuilding Plan Framework: The commission's legacy of inadequate and delayed action has contributed to the failed management

of the striped bass stock. As such, avoiding delays and taking needed action as quickly as possible to rebuild is required to avoid a worsening situation. I advise:

- Option B: 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 recruitment assumption specified in Amendment 7) 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.

Sincerely

Dan Ursini

94 Joseph Circle

Higganum Ct.

Sent from my iPhone

**From:** [steven hasselbacher](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Sunday, March 27, 2022 4:36:40 PM

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To whom it may concern,

My name is Steven Hasselbacher, I am a recreational angler from CT. I am in favor of the following options to help track towards a sustainable fishery in years to come.

Tier 1:

Option A: Sub option A-1

Option B: Sub option B-1

Option C: Sub option C-1

Tier 2

Option A: sub option A-2

Option B: sub option B-1

Option C: sub option C-1

Tier 3

Option A: suboption A-2

Option B: suboptimal B-2

Tier 4

Option B: sub option B1-a

Option C: Sub option C-3

Option D: sub option D-2

Option E: sub option E-2

Thank you

[Sent from Yahoo Mail on Android](#)

**From:** [david bixby](#)  
**To:** [Comments](#)  
**Cc:** [david bixby](#)  
**Subject:** [External] Fwd: Striped Bass  
**Date:** Sunday, March 27, 2022 3:48:20 PM

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ASMFC has failed to adequately protect the striped bass. Where I fish around Cape Cod we have experienced a precipitous decline in the quality of the fishery, including both in the juvenile population and the larger breeders. ASMFC needs to take aggressive steps to allow the fishery to recover. Please stop catering to special interests and in particular those who profit from the killing of bass. The targeting of large breeder bass by commercial fishermen in Massachusetts is deplorable.

You need to do better. Listen to those who advocate the greatest protection for the viability of this species. Frankly, a moratorium on the killing of bass is past due.

Thank you.

David Bixby

**From:** [mr.stasiuk@gmail.com](mailto:mr.stasiuk@gmail.com)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Sunday, March 27, 2022 3:03:23 PM

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Dear Emilie Franke,

This letter is to inform you of my choices regarding Draft Amendment 7 and the reasons it is important to maintain a healthy Striped bass population.

A healthy bass population is important to me as a recreational fisherman and steward of our natural resources in general. It is important to preserve the striped bass for future generations of recreational fisherman and, if sustainable, commercial fisherman as well.

Our quality of life depends on it. I have been through the extreme lows and highs of striper stocks and its concerning to see this downward trend once again.

I believe that a moratorium on all striped bass fishing can be avoided and stocks can be maintained at healthy levels by implementing the following:

4.1- Tier1 opt A1,C1,B1,C1

Tier2 opt A2,B1,C1

Tier3 opt A3,B2

Tier4 opt A

4.4.2- opt A,C1,C2,D1

4.4.1- opt B

4.4.2- opt B

4.6.2- sub opt B1a,B1c,B2b,C3,D3,E2

Thank you sincerely for your efforts,

Mark Stasiuk

576 Overbrook rd

Vineland,Nj 08360

Sent from my iPad

**From:** [Steven Schnebly](#)  
**To:** [Comments](#)  
**Subject:** [External] KAF Comments on Draft Amendment 7  
**Date:** Sunday, March 27, 2022 2:54:28 PM

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Dear Ms. Franke,

My questions may be construed as critical, but because of my five decades of recreational fishing, in that time exchanging thoughts with countless anglers/environmentalists, I have formed strong opinions as to the dire state of our coastal fishery. Therefore I feel the following questions are not just absolutely justified, but necessary.

The ASFMC has been existence for seventy plus years sustaining healthy coastal fishery resources (your words from your website) and coordinating the conservation and management of 27 nearshore fish species (also yours words). Yet in the last thirty five years, also according to your web page, Bluefish numbers have plummeted tenfold, Striped bass and Winter Flounder have literally fallen off the charts, Fluke about eight fold, and pretty much all of the 27 coastal species have crashed.

My questions therefore are such:

1 - Did you collect paychecks, courtesy of the US taxpayer, during this time?

2 - What new laws or regulations are you proposing this year that will completely reverse this long-standing decline?

3 - Considering the utter lack of enforcement (albeit by different government agencies) what assurances do you offer that any new or existing regulations will be more effective than all previous regulations ( and respectfully please let's not use the assertion "things would have been worse without us." Slowing extinction by a few years is not an impressive resume.

4 - Considering the ASFMC's track record, why should the recreational, and commercial fisherman not join together and demand you disband, and a new, efficient organization put in your place, or at least a top to bottom overhaul?

Sincerely,

Steven Schnebly  
326 LARCHMONT ACRES APT A  
LARCHMONT, NY 10538  
[smddfsh@gmail.com](mailto:smddfsh@gmail.com)



**From:** [John McIntyre](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass PID  
**Date:** Sunday, March 27, 2022 2:31:32 PM

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Hello Iam John Mc Intyre Owner of and Captain of Tight Line Charters. Based out of Long Island, New York ,fishing the Great South Bay and Fire Island Inlet. I'm sending this email to hopefully get some help for the Striped bass and Blue fish .Over the last several years I have noticed a serious decline in the stocks of these two fish which has really affected my fishing business as a light tackle Charter captain I personally believe that we have to do something now before it's too late, if it isn't too late already. The fall fishing that we had here on Long Island from September to late November is now only the first two weeks in November. I would appreciate all that we can do to help rectify this situation that we find ourselves in now. in the concerns of the striped bass and the bluefish and in reality for all of fish in our waters thank you very much. Tight Line Charters

Sent from my iPhone

From: [Bruce Bartolomeo](#)  
To: [Comments](#)  
Subject: [External] Draft Amendment 7 of the Striped Bass Fishery Management Plan  
Date: Sunday, March 27, 2022 12:32:49 PM

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Date: March 27, 2022

Subject: Draft Amendment 7 of the Atlantic Striped Bass Fishery Management Plan

Dear ASMFC Commissioners,

I have lived in New England almost all of my 60 years. I have been a lifelong recreational Striped Bass fisherman and have recently bought a retirement home in Rhode Island to enjoy my favorite passion with my extended family many of whom travel each summer to New England to rent vacation property along the shoreline. However, I am greatly concerned about the approach the ASMFC has taken to populate the stocks of the Striped Bass. Striped bass fishing has significantly deteriorated in New England over the past 15 years. And your own data agrees with mine, your reckless management has failed to protect the prized striped bass fishery. I am at the point of deciding to retire in Florida rather than Rhode Island as the recreational fishing has been so degraded. Now is the time to change your course in order to have any chance to save this fishery for the majority of us. I strongly urge you take action on the following amendments.

On 4.1 Management Triggers, I support:

- Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality
- Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold
- Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions
- Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, I support:

- Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method
- Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, I support:

- Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. I recognize this option may require more restrictive management measures than option A, which I support

On 4.4.2 Rebuilding Plan Framework, I support:

- Option B to allow the Board to take direct management actions as III as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, "Management program equivalency (also known as "conservation equivalency" or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management."

I believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically, I support:

- Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level
- Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates
- Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries
- Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

Sincerely,

Bruce Bartolomeo  
88 Winding Meadow Dr.  
Berlin, CT. 06037



**From:** [trout21](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass  
**Date:** Sunday, March 27, 2022 12:03:12 PM

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I have been deeply disappointed by the failure of ASMFC to properly manage the striped bass. I have been fishing Cape Cod for striped bass for thirty years. My experience is anecdotal but it is echoed by so many people who I respect that it takes on a surety for me. In the 90's and early 2000's there was an abundance of striped bass. I and my friends are primarily fly fishers and during that period there were small and modest striped bass everywhere along the beaches and harbors. This abundance continued until around 2017 when there was a kind inversion. Bass of over 30" became common and the smaller fish not so much. Then around 2019 the fishery for larger striped bass collapsed. Where in the past during a season I would catch several hundred stripers measuring over 30", I now caught three or four. I fish hard and long and I think I have considerable skill and knowledge about where to find bigger fish. I also have a network that supports knowledge of where the best fishing is at any time. In spite of all that, the scarcity of large bass was clear.

This decline has been so precipitous that it is shocking. Following the writing of conservationists I learned of the decline in juvenile fish in the annual survey of the Chesapeake. How your commission could have allowed this to continue without an aggressive response is simply hard to grasp.

I am not very technical so it is difficult for me to comment on the specifics of amendment 7. I would simply ask that you take the most conservative approach to reforming the management. By conservative I mean, no Pollyanna assumptions. Use numbers that represent the worse trends as the starting point and similarly use the most cautious numbers in determining the best actions for the future.

I implore you to stand up to the special commercial interests and to serve the future of striped bass rather than the monetary interests of the short sighted people who seem to have dominated in the past.

Sent from [Mail](#) for Windows

**From:** [Bill](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Sunday, March 27, 2022 11:36:21 AM

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I have been fishing for striped bass for decades and have seen the fishery recover only to get depleted again. Whenever striped bass populations finally recover, fishing restrictions are relaxed and the striped bass population shrinks once again.

So, I support the strongest conservation measures that the ASMFC can implement. I especially support season closures for the spring to allow striped bass to spawn and in the fall. Prohibiting trolling for striped bass would also help ensure that more larger striped bass are not harvested. The daily bag limit should be only one fish per person and recreational boat limit of no more than 3 fish, regardless of how many people are on the boat. Charter boats taking out many fishermen kill large numbers of striped bass. Enforcement efforts should be increased. It is still very common for fishermen to violate size and bag limits and to transfer fish to other boats on the ocean.

Commercial fishing for striped bass should be prohibited entirely. Striped bass should be a game fish only.

Sincerely,

William Doan

**From:** [Anita Bourque](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7 of the Atlantic Striped Bass Fishery Management Plan  
**Date:** Sunday, March 27, 2022 11:04:41 AM

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Date: March 27, 2022

Subject: Draft Amendment 7 of the Atlantic Striped Bass Fishery Management Plan

Dear ASFMC Commissioners,

As a woman recreational angler, I write to the commission urging rapid action to repair the damage to the striped bass fishery that has occurred under your watch. I have personally spent millions of dollars in vacation home real estate, fishing equipment, rentals, restaurants and other services in Rhode Island. The allure of the world-class striped bass fishing my growing family and I enjoyed along the coast was a key driver to this spending. Currently the fishing pales in comparison to that of two decades ago. It is rare when I walk down to the rocky coastline that I find bass. In fact, your own commission's report confirms my findings, that being the stock is depleted, over fished, and with low recruitment. This sorry state of affairs is undoubtedly, in part, due to mismanagement by your commission where repeated risky, highly speculative management options were adopted over prudent conservation measures. In addition to writing my elected representatives with my concerns over the competency of the ASFMC, I am sharing with you my suggestions on options related to Draft Amendment 7 of the Atlantic Striped Bass Fishery Management Plan which offer strong actions to protect the fishery consistent with the public trust.

On 4.1 Management Triggers, I support:

- Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality
- Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold
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On 4.2.2 Measures to Address Recreational Release Mortality, I support:

- Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method
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- Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coast wide level

Sincerely,

Anita Bourque, MD

5051 Ridge Rd

North Haven, CT 06473

**From:** [Aram Berberian](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Sunday, March 27, 2022 8:20:13 AM

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To the ASMFC Committee Members,

My name is Aram Berberian and I am a recreational fisherman from CT. I also do a lot of fishing in MA as well. I am writing because I am concerned about the striped bass fishery and its decline as I have experienced it. This is a remarkable species which has adapted over time to flourish in a wide range of environments. That it was transplanted successfully to the west coast via train is all you need to know to understand its resilience. We must protect this fish. You have been charged with crafting policy to do that. I am encouraged by the current work, but there is more to be done. Please see my preferences for options on Draft Amendment 7 which I believe will provide the best pathway to rebuilding the fishery and protecting this beloved fish for future generations of anglers.

**Tier 1**

Option A: sub-option A-1  
Option B: Sub-option B-1  
Option C: Sub-option C-1

**Tier 2**

Option A: sub-option A-2  
Option B: Sub-option B-1  
Option C: Sub-option C-1

**Tier 3**

Option A: sub-option A-2  
Option B: Sub-option B-2

**Tier 4**

Option B: sub-option B-1a  
Option C: Sub-option C-3  
Option D: Sub-option D-2  
Option E: Sub-option E-2

Thank you for your efforts and the opportunity to express my concerns and preferences.

Aram Berberian  
220 Knollwood Dr.  
New Haven, CT 06515



**From:** [Bianca Colasuonno](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment  
**Date:** Sunday, March 27, 2022 8:03:23 AM

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Hello-

Regarding amendment 7 on Striped Bass, I wanted to register my opinion that the population need to be managed with care. I believe size limits should go up and the use of gaffs should be made illegal without question immediately.

Once you gaff a fish, you're killing it whether it meets size limits or not.

As a long time Fisher-person it clear that there are far fewer striped bass and from what I read, scientists agree that the population is falling.

Hopefully with careful management the population will rebound.

Thanks

Sent from my iPhone

Bianca Colasuonno  
718-909-3169

Please excuse typographical errors. Sent from a mobile device.

**From:** [Andrew Edwards](#)  
**To:** [Comments](#)  
**Subject:** [External] Feedback  
**Date:** Saturday, March 26, 2022 7:39:36 PM

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To whom it may concern:

1. The data used to evaluate breeding stock assessment is flawed. There are too many variables not accounted or considered in the process. While at the public comment meeting on 3/23/2022 at the NYSDEC public comment meeting I brought this up and in fact the DEC agreed that the data is merely an estimation. I love these fish and are incredibly passionate about these fish and would support any and all conservation efforts needed to fix the biomass if the data was not flawed. Further more my in the field observations (which in my opinion is the best form of data because you see things real time and don't rely on estimates or statistics) have been nothing short of spectacular on the Hudson River for the last 3-4 seasons.
2. The education and outreach to anglers targeting striped bass needs to be increased and formalized. For HMS or Shark permits you have to take a online quiz before getting your permit. The same should be done for striped bass. Teach angler how to properly use circle hooks, how to properly handle fish, and some fishing etiquette,
3. Lastly, if the striped bass stock assessments are showing that they are truly in jeopardy. making striped bass a "Game Fish" would immediately help the rebuilding of the biomass.

Best,

Andrew

Sent from my iPhone

**From:** [Thomas Smith](#)  
**To:** [Comments](#)  
**Subject:** [External] Ammendment 7  
**Date:** Saturday, March 26, 2022 7:31:37 PM

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I fish in the spring in the Hudson River and also out in the Cape cod Waters and Long Island sound. Please review these comments and take them accordingly with your plans for striped bass conservation!

1. The data used to evaluate breeding stock assessment is flawed. There are too many variables not accounted or considered in the process. While at the public comment meeting on 3/23/2022 at the NYSDEC public comment meeting I brought this up and in fact the DEC agreed that the data is merely an estimation. I love these fish and are incredibly passionate about these fish and would support any and all conservation efforts needed to fix the biomass if the data was not flawed. Further more my in the field observations (which in my opinion is the best form of data because you see things real time and don't rely on estimates or statistics) have been nothing short of spectacular on the Hudson River for the last 3-4 seasons.
2. The education and outreach to anglers targeting striped bass needs to be increased and formalized. For HMS or Shark permits you have to take a online quiz before getting your permit. The same should be done for striped bass. Teach angler how to properly use circle hooks, how to properly handle fish, and some fishing etiquette,
3. Lastly, if the striped bass stock assessments are showing that they are truly in jeopardy. making striped bass a "Game Fish" would immediately help the rebuilding of the biomass.

**From:** [Anthony Frasca](#)  
**To:** [Comments; stripercomments@gmail.com](#)  
**Subject:** [External] Striped Bass  
**Date:** Saturday, March 26, 2022 7:07:05 PM

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Dear ASMFC Commissioners,

Under this commission's governance we find the striped bass stock overfished and depleted. The ASMFC has achieved the trifecta of resource mismanagement. The undisputed and very public failure of the ASMFC to meet striped bass stock biomass and fishing mortality rate targets has led to widespread criticism of this commission which was entrusted by the public to manage this uniquely valuable resource. ***At this juncture, the harm done to the striped bass fishery under your watch has damaged the credibility of the ASMFC and brought the integrity of the process under question.***

What does it take to convince the commission that recreational anglers are the engine that drives a number of industries that include: the tourism industry in general, hotels, bed and breakfasts, local restaurants, tackle shops, retail marketplaces, bars, and much more.

Recreational anglers are the lifeblood of so much commerce. In the absence of a well-stocked striped bass population, these industries suffer.

Shall we remind you of past failures that decimated the striped bass population so badly that there was barely a fishery? The striped bass is a conservation success story that is on the verge of becoming a conservation failure once again.

Sensible fisheries management should include the entirety of the fishery and not be limited to special interests.

Only with conservative management can we save this valuable resource for our grandchildren.

Warm regards,  
Anthony Frasca

**From:** [George Conboy](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Saturday, March 26, 2022 6:17:49 PM

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I am on the Hudson River every April until July fishing for Stripe bass and I don't see the same mortality rate as is reported in your study, we should have a course on how to use the circle hooks and how to handle the fish

Sent from my iPhone

**From:** [Michael Treola](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Saturday, March 26, 2022 5:54:24 PM

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We're all guilty of the state of the bass fishery. All of us! I am a stone's throw from Raritan Bay, New Jersey. I've been fishing my entire life and was on the surf with my father before I could walk or even understand what fishing was all about. Over decades I've come to know "my waters" in an overarching way as good as the science and data from professionals who study this for real. I fished with and learned from bayshore bass legends including my father. I went through the moratorium of the 80's and benefitted from it when we came out of it. Then I watched a fishery be raped and pillaged especially in the last 5-10 years in a very spectacular form.

Since my home base is the Raritan and northern Monmouth County surf lets just examine this zone for a minute and what I see each spring and fall.

- Boats are entering and leaving the water earlier and later. Never would you see so many boats in slips and fishing in March/April or November/December.
- I watch every spring/fall an unprecedented armada of boats targeting bass every spring and fall.
  - Years ago during this time you'd be lucky if you saw 20-30 boats early or late into the season. Now when word is out there is literally hundreds of boats even on a weekday.
  - Last year in one weekend a Rutgers student recorded 122 fish taken in two days on a weekend last fall. This was just my marina in one weekend... ONE!
  - Commercial Boats recreational boats here are raping these waters every day during breeding seasons.
    - I once thought these folks were stewards of the water - not they just disgust me.
- As if boating pressure is not enough, add the fleet of kayakers that could easily reach 50-100+ on a weekend not out of the ordinary. The kayak community seems more in tune to C&R but there is still an impact here that has to be recognized.
- Surf fishermen lining the beach for miles when not too long ago you might just see a few ladies or guys on a long stretch of beach here. Now you have people a couple hundred feet apart in places nobody but a few people fished.
- The internet heroes and zeros just broadcast all the info so another tsunami of people gets lumped on top of all of the above. I feel this to be the most shameful and detrimental aspect of this sport at the moment. You used to have to work to find the fish. Now it's go on the internet and be told go here, use this bait or lure and catch.
- Now nothing is sacred.
- Recreational boat guys are taking a lot of fish.
- Commercial fishing boats are taking a lot
- Kayakers are taking a lot of fish.
- Surf guys are taking a lot of fish.
- There are fish that don't survive C&R.
- Poachers and those that have absolutely zero respect for rules, the water or world are also playing a big part.
  
- It pains me to see how few game wardens there really are for the number of people fishing.

For a long time I have been guilty of all of this. I am a boater and have done these things. I am a kayaker and have done these things. I am a surf fisherman and have done these things. I shamelessly took the "look at me" photos of the fish I caught and while not saying where I got fish I poured fuel on a fire that looking back was ready a raging inferno.

Collectively we agree there is a problem, I don't need additional science or data to reinforce this. It's right in front of all of us, right there and right now. This means ALL OF US NEED TO ACT. If not we will see a full closure and rightfully so the fish deserve it. They really do. Today we truly don't deserve the privilege to target stripped bass and it saddens me to say this.

So what am I saying. The spring season here should be closed from January through April. I will even go on to say that this fishery should be catch and release for the foreseeable future. I know the commercial people are going to complain high and low over this but I have absolutely no sympathy for them anymore, much as I do for the recreational fisherman which I am. When I see daily photos on social media from recreational fisherman or for hire boats with a deck full of early season spawning fish it makes me sick. They created this problem we have now - we all have.

Please act in a strong way. I've never seen a fishery so mismanaged. You all are afraid of something and it's shameful to be honest. If you don't we're going to have a full closure in a few short years no matter what so you might as well be bold now.

Respectfully.

Michael Treola  
Middletown, NJ.

Life long fisherman and I'd like to remain this way.

**From:** [dan.tinmantackle.com](mailto:dan.tinmantackle.com)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 preferences  
**Date:** Saturday, March 26, 2022 4:03:49 PM

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Gentlemen

As a lifelong Striped Bass fisherman (over 65 years actively fishing) the health and abundance of the stock is of major importance to me. In addition to being a Striper fisherman I'm also a commercial tackle maker so you can see my concern for the Striper stock is more than just one sided. I have now lived thru two population crashes and am upset that the 2nd one had to happen at all. Apparently we didn't learn our lesson from the first time. With these thought in mind here are my preferences for the new Amendment 7 options.

#### **4.1 Management Triggers**

Tier 1

Option A1

Option B1

Option C1

Tier 2

Option A2

Option B1

Option C1

Tier 3

Option A3

Option B2

Tier 4

Option A

Option C1

Option C2

Option D1

#### **4.2.2 Recreational Release Mortality**

Option A

Option C1

Option C2

Option D1

#### **4.4.1 Rebuilding Plan**

Option B

#### **4.4.2 Rebuilding Plan Framework**

Option B

#### **4.6.2 Management Plan Equivalency**

Sub-Option B1a

Sub-Option B1c

Sub-Option B2b

Sub-Option C3



Sub-Option D3

Sub-Option E2

Thank you for your time to consider these preferred options.

Dan Brodzinski

10 Lake Park drive

Piscataway, New Jersey. 08854

732-983-1435

Dan@tinmantackle.com

**From:** [mobileweighstation@gmail.com](mailto:mobileweighstation@gmail.com)  
**To:** [Comments](#)  
**Subject:** [External] Re: Draft Amendment 7  
**Date:** Saturday, March 26, 2022 2:21:37 PM  
**Importance:** High

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Dear ASMFC,

I have noticed a difference in the numbers and quality of striped bass around 2011 or so and have been writing the ASMFC beginning in 2013 and subsequently the governors of nearly all of the states located on the eastern seaboard where I shared my concerns. Unfortunately not nearly enough has been done to avert what I and many others saw coming. The fishery has gotten so bad in my home waters that I hardly go or spend any money on fishing related equipment. The current status of the fishery in my home waters is reminiscent of what I experienced as a kid fishing in the late 80s. I truly miss the camaraderie I experienced with my fishing buddies and miss the early mornings and week day nights after a long day at the office where I could not only enjoy the peace and tranquility of being on the water but have the ability to partake in my passion of surf fishing for striped bass. Please help me and the many others that share my concerns and implement the actions below so we can all enjoy a healthy fishery in the future. I shouldn't have to wait to retire to Florida to enjoy good fishing when we have the ability to have great fishing in our backyards.

Thanks,  
James Sabatelli  
Massapequa Park, NY

#### **4.1 Management Triggers**

##### *Tier 1-Fishing Mortality Management Triggers*

Option A1  
Option B1  
Option C1

##### *Tier 2-Female SSB Management Triggers*

Option A2  
Option B1  
Option C1

##### *Tier 3-Recruitment Triggers*

Option A3  
Option B2

##### *Tier 4-Deferred Management Action*

Option A

#### **4.2.2 Recreational Release Mortality**

Option A  
Option C1  
Option C2  
Option D1

#### **4.4.1 Rebuilding Plan**

Option B

#### **4.4.2 Rebuilding Plan Framework**

Option B

#### **4.6.2 Management Program Equivalency**

Sub-Option B1a

Sub-Option B1c

Sub-Option B2b

Sub-Option C3

Sub-Option D3

Sub-Option E2

**From:** [Christopher Olsen](#)  
**To:** [Comments](#)  
**Subject:** [External] stripercomments@gmail.com; ECH12@cornell.edu; Maureen.Davidson@DEC.NY.GOV; Carol.Hoffman@DEC.NY.GOV; James.Gilmore@DEC.NY.GOV; Kaminsky@NYSENATE.GOV  
**Date:** Friday, March 25, 2022 11:48:15 AM

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Hello All,

I am writing in regards to Striped Bass Amendment 7. I am submitting my positions on options below. I am taking the time to submit these comments because the striped bass is extremely important to me, and it is time I get involved in conservation of the species because quite frankly I am seeing the harm being done and the time to act is certainly right now. I spend countless days on the water during the striped bass season and travel all over Long Island, NY to pursue these fish. It is a passion. It's important to note, I have also spent time targeting other fresh and saltwater species throughout the US. I can genuinely say I have not come across a species as versatile and impressive as the striped bass, and I believe that is why I and so many others are so adamant about their protection. From sand beaches, back bays, boulder fields, open ocean, rivers, marshes, it is incredible the habitats that this species can be found and that in itself in my opinion is worth protecting. The striped bass is so much more than a filet on a dinner plate. The striped bass is a lifestyle, a staple, and quite frankly an entire economy throughout the Northeast. I will not try to play the blame game, I will simply provide my comments to amendment 7 below and hope that my, and other passionate striped bass advocates, opinions are strongly considered in this process.

#### 4.1 Management Triggers:

Tier 1: Fishing mortality triggers:

Option A - I support Sub-Option A1

Option B - I support Sub-Option B1

Option C - I support Sub-Option C1

Tier 2: Spawning Stock Biomass triggers:

Option A - I support Sub-Option A2

Option B - I support Sub-Option B1

Option C - I support Sub-Option C1

Tier 3: Recruitment triggers:

Option A - I support Sub-Option A2

Option B - I support Sub-Option B2

Tier 4: Deferred Management Plan:

Option A - I support Option A

#### 4.2.2 Measure to Address Recreational Release Mortality

Option C: Additional Gear Restrictions

Option C - I support Sub-Option C1

Option C - I support Sub-Option C2

Option D: Outreach and Education

Option D - I support Sub-Option D2

#### 4.4 Rebuilding Plan

#### 4.4.1 Recruitment Assumption for Rebuilding Calculation

Option B - I support Option B

#### 4.4.2 Rebuilding Plan Framework

Option B - I support Option B

#### 4.6.2 Management Program Equivalency

Option B - Restrict use of conservation equivalency based on stock status - I support Sub-Option B1-a

Option C - Precision Standards for MRIP Estimates used in CE Proposals - I support Sub - Option C3

Option D - CE Uncertainty buffer for non-quota managed fisheries - I support Sub-Option D2

Option E - Definition of Equivalency for CE Proposals with Non-quota managed Fisheries - I support Sub-Option E2.

Christopher K Olsen

(516) 661-7251

**From:** [Bizzy Gross](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, March 25, 2022 11:14:41 AM

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Good morning,

I am reaching out due to concern for the Atlantic Striped Bass. A science based management plan of is the right decision and will help ensure the longevity of stripers.

Regarding Amendment 7, 4.6.2 option B, I support and recommend sub option B1-A where Conservation Equivalency (CE) programs would not be approved when stock has been overfished based on biomass threshold.

For C, I support Option C3 where CE requests are not able to use estimates with a percent standard error of 30% or greater.

For D, I support option D2 where non-quota managed fisheries would be required to use a buffer of 25% due to uncertainty.

And finally for E, I support E2 where the percent of reduction projected for standard is at the state specific level.

Please make the survival of stripers the priority in this amendment. Do not bend over for special interest groups that are looking for short term gains.

Thanks,  
Elisabeth Gross

**From:** [DANIEL VIAFORE](#)  
**To:** [Comments](#)  
**Subject:** [External] Please Draft Amendment 7  
**Date:** Friday, March 25, 2022 9:49:00 AM

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My name is Daniel Viafore. I have been a recreational fisherman for 65 years and was a party boat mate for 25. I remember the boom years of th70's, but I also remember the 80's and how successful the moratorium was to save the striped bass. I, like all anglers, have seen a steady decline in recent years, and would never want a repeat of the 80's! Passage of Amendment 7 would prevent another catastrophe! Please adopt it ASAP! Thank you for all your efforts!

Sent from my iPhone

**From:** [John](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped bass Amendment 7  
**Date:** Thursday, March 24, 2022 10:33:10 PM

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Dear commission

I am commenting on the proposed striped bass Amendment 7. I am an avid fisherman who cares deeply for our striped bass fishery. Before I comment on the individual pieces of the proposed Amendment 7, I would like to make a few general comments and recommendations.

The public information document for Amendment 7 was very complex and I believe it dissuaded public engagement. It was far too long, with too much jargon and unnecessary details. I know, for a fact, that this prevented people from engaging in the process, or submitting comments- it was too much time and effort to even read the document, let alone understand all the nuance and details, and then comment on all the choices. **In the future, at minimum there should be some kind of summary document that is short enough for the average citizen to read in less than 15-minutes, which can be understood by everyone.**

The ASMFC has stated that the public is losing faith in their ability to make swift, critical decisions based on science and public input. **Please, act fast and in accordance with science and the majority's wishes:** do not delay or we will lose this fishery forever.

· This is a critical moment for the striped bass, and we all- including the commission- know it. **Please, consider managing the striped bass for abundance and not for yield** when making your decisions. Note that the striped bass fishery is almost entirely a recreational, catch and release, fishery, and that is where the largest portion of the GDP generated by the fishery comes from. The good news is, **the more fish in the ocean, the better it is for everyone: the fish, the economy, and the citizen angler..**

· In the past, the ASMFC has adopted measures with low statistical chances of being successful, over very long timelines. I believe this is the wrong way to manage this fishery. **We need better management and more aggressive measures that have a higher likelihood of protecting the fishery, and rebuilding and responding more quickly.** I am in support of management that favors keeping "too many" fish in the ocean, and responding to low spawning years and increased effort on a year-by-year



basis.

· I am in total opposition to any measure that would decrease the benchmarks the fishery is managed by. **That is, we should not be lowering or shifting baselines. We have managed the population well in the past, and should never consider decreasing our population targets** (SSB thresholds and triggers). A sliding baseline is unacceptable and will be the demise of the fishery.

I'm not sure if this can be tied in but the draggers and netters must be regulated and scrutinized much more harshly they are raping the oceans of bait fish that our beloved stripers and other pelagic species need to thrive nevermind all the by catch that gets killed.

Lastly please make poaching fines and punishment much more severe they are too lenient and poachers often repeat because it's economically favorable to just pay the fines it's a joke.

sincerely,

LeeAnn Tombros

188 oak St

Pembroke MA 02359

**From:** [Sal Miciotta](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Thursday, March 24, 2022 9:31:19 PM

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To the commission

I am commenting on the proposed striped bass Amendment 7.

My name is **Sal Miciotta** and I am from the state of **New York**. I am an avid **Surfcaster** who cares deeply for our striped bass fishery. Before I comment on the individual pieces of the proposed Amendment 7, I would like to make a few general comments and recommendations. **I have put my specific comments to the individual questions/tiers related to Amendment 7 in a simple list at the end of this document**, for ease of data collection by the administrative staff.

The public information document for Amendment 7 was very complex and I believe it dissuaded public engagement. It was far too long, with too much jargon and unnecessary details. I know, for a fact, that this prevented people from engaging in the process, or submitting comments- it was too much time and effort to even read the document, let alone understand all the nuance and details, and then comment on all the choices. **In the future, at minimum there should be some kind of summary document that is short enough for the average citizen to read in less than 15-minutes, which can be understood by everyone.**

· The ASMFC has stated that the public is losing faith in their ability to make swift, critical decisions based on science and public input. **Please, act fast and in accordance with science and the majority's wishes:** do not delay or we will lose this fishery forever.

· This is a critical moment for the striped bass, and we all- including the commission- know it. **Please, consider managing the striped bass for abundance and not for yield** when making your decisions. Note that the striped bass fishery is almost entirely a recreational, catch and release, fishery, and that is where the largest portion of the GDP generated by the fishery comes from. The good news is, **the more fish in the ocean, the better it is for everyone: the fish, the economy, and the citizen angler..**

· In the past, the ASMFC has adopted measures with low statistical chances of being successful, over very long timelines. I believe this is the wrong way to manage this fishery. **We need better management and more aggressive measures that have a higher likelihood of protecting the fishery, and rebuilding and responding more quickly.** I am in support of management that favors keeping "too many" fish in the ocean, and responding to low spawning years and increased effort on a year-by-year basis.

· I am in total opposition to any measure that would decrease the benchmarks the fishery is managed by. That is, we should not be lowering or shifting baselines. We have managed the population well in the past, and should never consider decreasing our population targets (SSB thresholds and triggers). A sliding base-line is unacceptable and will be the demise of this fishery!

· While I would be in favor of closing spawning areas to both harvest and targeting of striped bass, there is no scientific evidence it would lead to any appreciable increase in the size of the population (SSB or YOY). If the commission can prove it would, I would absolutely be in favor of this measure- and even longer periods of closed fishing, if that would help even more. However, I fear some states will ultimately fight so hard against this measure, that they will not be willing to accept other, more important parts of this amendment. That, and law enforcement has deemed this measure unenforceable. For this reason, at this time, I do not support 4.2, tier B. However, I would be in support of closures if these concerns could be addressed, and would even support stricter and/or longer closures if it ultimately leads to abundance.

**Above all else, I ask that the ASMFC act quickly, decisively, and with abundance- not yield- at the forefront of their striped bass management decisions. We must rebuild this fishery in less than 10-years, and at all costs, and that requires immediate and aggressive action from the commission.**

**I am 62 years old. I fished through the 70's and 80's and I remember a time when the striped bass fishery was in the same terrible shape that it is in today. Aggressive steps were taken back then and the fishery recovered rapidly. We had several great years through the 90's and early 2000's. I want to see us get back to that level of abundance and am more than willing to do my part and sacrifice to make it happen.**

Thank you for the opportunity to comment, and hope that my voice will be heard, and we can save this important and beloved fishery.

#### **4.1**

##### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

##### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

##### **Tier 3**

Option A- Support A3

Option B- Support B2

**Tier 4**

Support A

**4.2**

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D1

**4.4.1**

Support B

**4.4.2**

Support B

**4.6.2**

Option B- Support B1-a

Option C- Support C3

Option D- Support D3

Option E- Support E3

Sincerely

Sal Miciotta

Seaford NY

Sent from [Mail](#) for Windows

**From:** [Donnie Bayne](#)  
**To:** [Comments](#)  
**Subject:** [External] There are more Striped Bass in the Chesapeake Bay than I've ever seen. I'm 70 years old.  
**Date:** Thursday, March 24, 2022 8:29:20 PM

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Sent from my iPhone

**From:** [Jesse Gordon](#)  
**To:** [Comments](#)  
**Cc:** [Jesse Gordon](#)  
**Subject:** [External] Comments on Striped Bass Amendment-7  
**Date:** Thursday, March 24, 2022 6:12:52 PM

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To the Commission:

It is with great concern for the future of the striped bass fishery that I am commenting on the proposed striped bass Amendment 7.

My name is Jesse Gordon and I am from Orient NY. I am an avid recreational fisherman who cares deeply about our striped bass fishery. I would like to begin with few general comments and recommendations. For ease of data collection by the Commission, **I have, however, put my specific comments to the individual questions/tiers related to Amendment 7 in a list at the end of this email.**

Although well intentioned, I believe that the public information document for Amendment 7 was overly voluminous and complex and may have had the unintended result of dissuading public engagement.. **In future endeavors to provide the public with information regarding proposed amendments, I believe the Commission should try to simplify the process and provide a summary document that is more concise and easily digested.**

The ASMFC has stated that the public is losing faith in their ability to make swift, critical decisions based on science and public input. **Please, act quickly, and in conjunction with the scientific data:** please do not delay or we will lose this fishery forever. This is a critical moment for the striped bass. The opportunity to protect this fishery should not be squandered! **It is imperative that the Commission proceed with managing the striped bass for abundance and not for yield.** The striped bass fishery is an almost entirely recreational, catch and release, fishery, and that is where the largest portion of the revenues generated by the fishery originate. **The more fish in the ocean, the better it will for everyone: the fish, local economies, and the angler.**

Unfortunately, in the past, the ASMFC has adopted measures with low statistical chances of success, over lengthy timelines. **I believe this is the wrong way to manage this fishery. Better management is needed and more aggressive measures, with a higher likelihood of protecting the fishery, and rebuilding and responding more quickly.** I am in support of management that favors keeping “too many” fish in the ocean, and responding to low spawning years and increased effort on a year-by-year basis.

I remain opposed to any and all measure that would decrease the management benchmarks. **Accordingly, we should not be lowering or shifting baselines. We have managed the population well in the past, and should never consider decreasing our population targets (SSB thresholds and triggers).** A sliding base-line is unacceptable and will be the demise of this fishery!

While I would be in favor of closing spawning areas to both harvest and targeting of striped bass, there is no scientific evidence it would lead to any appreciable increase in the size of the

population (SSB or YOY). If the commission can prove it would, I would absolutely be in favor of this measure- and even longer periods of closed fishing, if that would help even more. However, I fear some states will ultimately fight so hard against this measure, that they will not be willing to accept other, more important parts of this amendment. That, and law enforcement has deemed this measure unenforceable. For this reason, at this time, I do not support 4.2, tier B. However, **I would be in support of closures if these concerns could be addressed, and would even support stricter and/or longer closures if it ultimately leads to abundance.**

**Above all else, I ask that the ASMFC act quickly, decisively, and with abundance- not yield- at the forefront of all striped bass management decisions. We must rebuild this fishery in less than 10-years, and at all costs, and that requires immediate and aggressive action from the Commission.**

I have spent many years fishing the East End of Long Island. I remember fondly, as a child, the abundance of winter flounder which were eventually decimated by over-fishing and poor management. I also recall the rebound of the Striped Bass population in the early 1990's after the moratorium. It is evident to me from these two extremes, that proper management makes a significant difference. In this regard, I implore the Commission to put aside the pressures of the special interest groups, the squabbles between the the recreational and commercial fisherman, and do what is best for the striped bass!

Below is a list of of specific comments relating to Amendment 7 for your consideration:

#### **4.1**

##### **Tier 1**

Option A- I Support A1

Option B- I Support B1

Option C- I Support C1

##### **Tier 2**

Option A- I Support A2

Option B- I Support B1

Option C- I Support C1

##### **Tier 3**

Option A- I Support A3

Option B- I Support B2

##### **Tier 4**

I Support A

## **4.2**

Option B- I Support no measure

Option C- I Support C1, C2

Option D- I Support D1

### **4.4.1**

I Support B

### **4.4.2**

I Support B

### **4.6.2**

Option B- I Support B1-a

Option C- I Support C3

Option D- I Support D3

Option E- I Support E3

Respectfully submitted,

Jesse Gordon

Orient, NY



**From:** [George & Donna Osing](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass management  
**Date:** Thursday, March 24, 2022 4:52:47 PM

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How about giving the rockfish a break for the next few years and make them a catch and release only. Lures only. Shorten the season and ban the commercial fishing before these fish disappear altogether!

Thanks  
George Osing  
Ellicott City md.

[Sent from the all new AOL app for Android](#)

**From:** [Teddy Nesius](#)  
**To:** [Comments](#)  
**Cc:** [Jerry Audet](#)  
**Subject:** [External] Striped Bass Amendment 7 comments  
**Date:** Thursday, March 24, 2022 4:18:44 PM

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To the commission

I am commenting on the proposed striped bass Amendment 7.

My name is Theodore Nesius and I am from the state of Massachusetts . I am an avid surfcasters/recreational fisherman who cares deeply for our striped bass fishery. Before I comment on the individual pieces of the proposed Amendment 7, I would like to make a few general comments and recommendations. **I have put my specific comments to the individual questions/tiers related to Amendment 7 in a simple list at the end of this document**, for ease of data collection by the administrative staff.

· The public information document for Amendment 7 was very complex and I believe it dissuaded public engagement. It was far too long, with too much jargon and unnecessary details. I know, for a fact, that this prevented people from engaging in the process, or submitting comments- it was too much time and effort to even read the document, let alone understand all the nuance and details, and then comment on all the choices. **In the future, at minimum there should be some kind of summary document that is short enough for the average citizen to read in less than 15-minutes, which can be understood by everyone.**

· The ASMFC has stated that the public is losing faith in their ability to make swift, critical decisions based on science and public input. **Please, act fast and in accordance with science and the majority's wishes:** do not delay or we will lose this fishery forever.

· This is a critical moment for the striped bass, and we all- including the commission- know it. **Please, consider managing the striped bass for abundance and not for yield** when making your decisions. Note that the striped bass fishery is almost entirely a recreational, catch and release, fishery, and that is where the largest portion of the GDP generated by the fishery comes from. The good news is, **the more fish in the ocean, the better it is for everyone: the fish, the economy, and the citizen angler..**

· In the past, the ASMFC has adopted measures with low statistical chances of being successful, over very long timelines. I believe this is the wrong way to manage this fishery. **We need better management and more aggressive measures that have a higher likelihood of protecting the fishery, and rebuilding and responding more quickly.** I am in support of management that favors keeping “too many” fish in the ocean, and responding to low spawning years and increased effort on a year-by-year basis.

· I am in total opposition to any measure that would decrease the benchmarks the fishery is managed by. **That is, we should not be lowering or shifting baselines. We have managed the population well in the past, and should never consider decreasing our population targets** (SSB thresholds and triggers). A sliding base-line is unacceptable and will be the demise of this fishery!

· While I would be in favor of closing spawning areas to both harvest and targeting of striped bass, there is no scientific evidence it would lead to any appreciable increase in the size of the population (SSB or YOY). If the commission can prove it would, I would absolutely be in favor of this measure- and even longer periods of closed fishing, if that would help even more. However, I fear some states will ultimately fight so hard against this measure, that they will not be willing to accept other, more important parts of this amendment. That, and law enforcement has deemed this measure unenforceable. For this reason, at this time, I do not support 4.2, tier B. However, **I would be in support of closures if these concerns could be addressed, and would even support stricter and/or longer closures if it ultimately leads to abundance.**

**Above all else, I ask that the ASMFC act quickly, decisively, and with abundance- not yield- at the forefront of their striped bass management decisions. We must rebuild this fishery in less than 10-years, and at all costs, and that requires immediate and aggressive action from the commission.**

If Amendment 7 goes the way I support in my letter and comment. I would support an immediate Addendum to eliminate the harvest of striped bass.

Thank you for the opportunity to comment, and hope that my voice will be heard, and we can save this important and beloved fishery.

#### **4.1**

##### **Tier 1**

Option A- Support A1

Option B- Support B1

Option C- Support C1

##### **Tier 2**

Option A- Support A2

Option B- Support B1

Option C- Support C1

### **Tier 3**

Option A- Support A3

Option B- Support B2

### **Tier 4**

Support A

## **4.2**

Option B- Support no measure

Option C- Support C1, C2

Option D- Support D1

### **4.4.1**

Support B

#### **4.4.2**

Support B

#### **4.6.2**

Option B- Support B1-a

Option C- Support C3

Option D- Support D3

Option E- Support E3

Sincerely,

Theodore Nesius

Quincy, MA. 02171

**From:** [JAMES GILLEY](#)  
**To:** [Comments](#)  
**Subject:** [External] Rockfish Suggestion  
**Date:** Thursday, March 24, 2022 3:10:53 PM

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Hello,

There are no tangible data on recreational harvest of rockfish. Add a tagging system ( just like deer hunting) have 10 tags. Tag the fish when tags are used give ten more. Then we have an accurate count of fish coming out of the waters. System is already in place so should not cost much to add to compass system in MD. Commercial rockfish already do this. Educated guesses and data sheets are great if the data is accurate.

Just a suggestion.

Thanks James

**From:** [Jake Brandspigel](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Draft Amendment 7: WO  
**Date:** Thursday, March 24, 2022 1:36:08 PM

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Dear Ms. Franke,

Dear Management Board,

As an avid fisherman of the Chesapeake bay and its tributaries, I'm troubled by the lack of striped bass in the water. Please leave some menhaden in the water so they can eat, grow and reproduce.

Thanks

Jake

Sincerely,  
Jake Brandspigel  
500 Oak Grove Rd.  
Norfolk, VA 23505



**From:** [Robert Groskin](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment #7  
**Date:** Thursday, March 24, 2022 1:11:45 PM

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I am writing to urge the ASMFC to support the following options in Amendment #7. I am particularly concerned about this abuse of the Conservation Equivalency and hope the Commission will vote to limit its use and ensure all states share equally in preventing over fishing and the stock being overfished. I am confident the Commission will act on options affect one year responses when the stocks targets are triggered.

Please support the following

4.6.2 Management Program for Equivalency

- Option B Restrict the use of CE based on stock status
  - Suboption B1-a
- Option C Precision Standards
  - Suboption C3- ensures a higher level of precision in surveys by states
- Option D CE uncertainty buffer-
  - Suboption D2- if you are going to allow CE, there should be a greater certainty that the goals shall be reached
- Option E Definition of Equivalency for Conservation Programs
  - Suboption E2-

As a New Jersey resident, I am embarrassed that the Commission allowed New Jersey to change their mandated reductions at the cost to all the other states in the Compact. Please do not allow this to happen anymore.

Sincerely

Robert Groskin, DVM

signature\_1125617062



**Robert Groskin, DVM, Executive Director**  
**Association of Avian Veterinarians**

PO Box 9 | Teaneck, NJ 07666, USA

720-458-4111 ext 1 | Fax 720-398-3496 | E-mail [rgroskin@aav.org](mailto:rgroskin@aav.org)

Find us on Facebook at [www.facebook.com/aavonline](http://www.facebook.com/aavonline)



**From:** [Aaron Landry](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 Comments  
**Date:** Thursday, March 24, 2022 12:15:24 PM

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To whom it may concern:

My name is Aaron Landry. I am a High School Biology teacher and Fishing Guide on Casco Bay in the summer. I grew up on Munjoy Hill in Portland, Maine. Since I was old enough to walk to the shore I have been fishing saltwater. When I was a kid the Striped Bass was mythical. My father - from Maryland - would tell stories of this amazing fish that was amazing to fish for and incredible to eat. Despite spending countless hours fishing from the rocks around the East End Beach and catching hundreds of mackerel, bluefish, and pollack, the only stripers I ever saw were pictures on signs at boat launches. The posters that I can still picture today, informed that all Striped Bass must be released at once.

And then - they returned. The moratorium worked. Turns out if we stop keeping fish the population will rebound.

As the population increased regulations relaxed. The amazing fishery that developed in the mid to late 90's vanished. Now we are left with large areas of the coast in Maine that year to year are virtually devoid of fish.

I tell my kids of how amazing the fishing was in the mid to late 90's. They ask what happened. My father must have had the same problem answering as I do. What do I tell them? I have to tell them the same thing my dad told me. We did it. We kept too many fish. Specifically for us in Maine, it is the fault of the agencies that are responsible for regulating the fishery because we cannot control what is happening in Maryland and New Jersey.

To this end I am asking you to do whatever is necessary to make the decisions that give the striped bass best chance to return to a healthy and robust population. A healthy population means that there are large numbers of multiple year classes that make the entire migration to the northern end of their range. Having what appears to be large numbers in MD, NY, and NY during the spring migration does not mean that the population is sound.

Amendment 7 is a beast of a document. Even for someone who has a background in fisheries and is currently involved in academia, reading it is tough and weighing in on it may even be more daunting.

I will focus on two parts as I feel they may be the most important to realizing the goal of returning the striped bass to abundance that I have witnessed in my lifetime.

First - all benchmarks should be the most conservative and sensitive and timelines to

remedy should be the shortest in the document. Moving the goalposts and kicking the can down the road is what got us where we are and will not help us get out.

#### 4.1 Management Triggers

- Tier 1 F Triggers
  - Option A  
A1
  - Option B  
B1
  - Option C  
C1
- Tier 2 SSB Triggers
  - Option A  
A2
  - Option B  
B1
  - Option C  
C1
- Tier 3 Recruitment Triggers
  - Option A  
A2
  - Option B  
B2
- Tier 4 Deferred Management Action
  - Option A

Second and perhaps most importantly - Conservation Equivalence is not a management strategy in the manner it has been employed. It has become a way for states at the heart of the nursery of the fishery to play by different rules than the rest of the states. Stripers are migratory and in order to manage the fishery effectively - especially with a fish that is so heavily targeted coast wide - regulations must be constant, particularly if the population is in trouble. Imagine if the Northern states were allowed to hunt for ducks in the summer during nesting season and as the population decreased we continuously lobbied the Department of the Interior to let us make our own rules to keep shooting. This seems extreme and while it is a bit of hyperbole, the point is that as striped bass decrease in numbers we allow some states to continue to keep small fish at a high rate and somehow call that equivalent.

**I believe that there should be no Conservation Equivalency while the stock is overfished.**

#### 4.6.2 Management Program Equivalency (CE)

- Option B Restrict the use of CE based on stock status
  - Sub-option B1-a

I urge the committee to take the stance that we make whatever it takes to restore the fishery the priority instead of the interests of a few states.

Thank you for your time,

Aaron Landry

--

Aaron Landry  
Science Teacher  
Boys Tennis Coach  
Gorham High School  
207-222-1119  
[aaron.landry@gorhamschools.org](mailto:aaron.landry@gorhamschools.org)

**From:** [Emilie Franke](#)  
**To:** [Comments](#)  
**Subject:** FW: [External] Shut down the Atlantic striped bass fishery immediately  
**Date:** Thursday, March 24, 2022 9:50:06 AM

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**From:** Robert Beal  
**Sent:** Thursday, March 24, 2022 9:34 AM  
**To:** 'tim johnson' <[ballalldaysports@gmail.com](mailto:ballalldaysports@gmail.com)>  
**Cc:** Emilie Franke <[EFranke@asmfc.org](mailto:EFranke@asmfc.org)>; Dan Mckiernan <[dan.mckiernan@state.ma.us](mailto:dan.mckiernan@state.ma.us)>  
**Subject:** RE: [External] Shut down the Atlantic striped bass fishery immediately

Good Morning Mr. Johnson,

I appreciate you taking the time to send your thoughts on striped bass management. As you may know, ASMFC has a public comment period open for Amendment 7 to the Striped Bass FMP. I will make sure your email is included in the public comment record for the Amendment to be shared with the Striped Bass Management Board.

Based on your comments, I assume you live and/or fish in Massachusetts. If you are aware of illegal fishing activity, I encourage you to contact Major Pat Moran with the Massachusetts Environmental Police 508-992-8321 to report your observations.

Regards,  
Bob

*Bob Beal*  
*Executive Director*  
*Atlantic States Marine Fisheries Commission*  
*Phone: 703.842.0740*  
[www.ASMFC.org](http://www.ASMFC.org)

**From:** tim johnson <[ballalldaysports@gmail.com](mailto:ballalldaysports@gmail.com)>  
**Sent:** Monday, March 21, 2022 4:13 PM  
**To:** Robert Beal <[Rbeal@asmfc.org](mailto:Rbeal@asmfc.org)>  
**Subject:** [External] Shut down the Atlantic striped bass fishery immediately

The Atlantic striped bass fishery is on the verge of a total collapse and you guys are still on the fence about imposing a moratorium on the harvest of these fish? It just blows my mind what goes on in your organization. The young fish are being slaughtered by illegal immigrants, the breeder sized fish are being slaughtered in Massachusetts by commercial fisherman who had a green light from Daniel Mckiernan to kill 15 per night because of "Covid". The slot fish are

being slaughtered by people who follow the laws and kill them without a clue of what's going on with the state of the fishery.

And you guys are still sitting there in your offices clueless on what to do?

I just cannot believe your organization, God bless the day that someone develops the testicular fortitude to do what is necessary and shut this Goddam fishery down for the next ten years followed by the absolute strictest regulations possible.

Unbelievable.

**From:** [brian.moran](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped bass  
**Date:** Thursday, March 24, 2022 7:45:54 AM

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Striped bass,,,,make it a game fish  
Take the bounty off it's head.



**From:** [Richard Grein](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, March 24, 2022 6:58:25 AM

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Dear Emilie Franke and the Atlantic States Marine Fisheries Commission

My name is Richard Grein

I would like to start by saying I was at your Kings Park meeting last week. I missed the sign in sheet. I thought the meeting was well run and informative. Thank you all for your time and effort to get this amendment out and understood.

I live on Long Island New York fished for striped bass long enough to see a high and a low. I watched a great recovery only to crash again. It saddens me to see the stocks in such disrepair.

I taught my kids to surf fish for bass and blues. I would love to see them grow to teach their kids to do the same. Action needs to be taken swiftly. I would like to support these following option on amendment 7

Thank you for your time and the great effort you have given.  
Richard Grein

Management Options I Support:

Tier 1: Management Triggers:

Option A1

Option B1

Option C1

Tier 2: Female Spawning Biomass:

Option A2

Option B1

Option C1

Tier 3: Recruitment Triggers:

Option A3

Option B2

Tier 4:

Option A

4.2.2: Recreational Release Mortality (we oppose B1 and B2)

Option A

Option C1

Option C2

Option D1

4.4.1: Rebuilding Plan:

Option B

4.4.2: Plan Framework:

Option B

4.6.2: Management Program Equivalency:

Sub-option B1a

Sub-option B1c

Sub-option B2b

Sub-option C3

Sub-option D3

Sub-option E2

Sent from my iPhone

**From:** [Joe DeMarco](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Draft Amendment 7  
**Date:** Thursday, March 24, 2022 5:43:43 AM

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Good Morning,

I had planned on attending last night's public meeting in New Plaltz, however I was unable to attend.

I have been fishing the upper Hudson River for Striped Bass from Kingston NY to the Federal dam in Troy NY for 40 years. I have professionally fished it as a Charter Captain for over 15 years. I recently retired from charter fishing and now just enjoy being out there with family & friends. My observations over the years in fishing for Anadromous fish such as Striped Bass, Alewife & Blue back Herring has definitely been an educational experience. I've seen tough seasons however mostly very good seasons.

There are many sport fisherman that do not want to see a closure of the Striped Bass season. I have actually observed the spawning of Striped Bass for many years. It's usually a 3-5 day window which the water temperature dictates. A 2week closure during the spawn is a bit much when these fish are here for only a short period of time. I think that a management plan such as educating anglers on how to properly release Striped bass would be very effective. If catch and release (with no harvest) was put into place, it may prove to be very effective rather than having a closure of the Striped Bass season.

Here in NewYork, we are required to obtain a Recreational Marine Fishing license to fish for Anadromous fish from the sea. Perhaps an educational tutorial on how to properly release Striped Bass can be put in place and be a requirement to complete prior to obtaining a Recreational Marine fishing license.

I do not think it is right to take away from all these people that absolutely love this fishery.

You folks are the educated professionals on this, I'd like to think that a better plan than closure can be put into place.

Sincerely,

Joe DeMarco  
USCG Licensed Captain  
Retired

Sent from my iPhone

**From:** [Peter Mohlin](#)  
**To:** [Comments](#)  
**Cc:** [Peter Mohlin](#)  
**Subject:** [External] Draft Amendment 7 Comments from Maine Rec Fisherman  
**Date:** Wednesday, March 23, 2022 4:50:52 PM

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Dear ASMFC,

I am a recreational striped bass fisherman from Southern Maine. My wife just gave birth to our first child, a boy. We named him after my father who introduced me to striped bass fishing when I was 5 years old. It saddens me to think my son and I won't get to share the same experience because the striped bass population crashed and nothing was done to save it. For that reason, and all those that depend on the future of this fish, I support the following options in Draft Amendment 7:

- 4.1 Management Triggers - it is crucial to move as quickly as possible across all 4 Tiers of this section. In particular:
  - Tier 1 Option A
    - Sub option 1 A - this is the shortest timeframe to get F back below the target
  - Tier 2 Option A
    - Sub option A2 - putting a deadline on implementing a rebuilding plan ensures that plan will happen!
  - Tier 2 Option B
    - Sub option B1 - it is equally important to manage SSB as it is to manage F
  - Tier 3 Option A
    - Sub option A3 - a more sensitive trigger would be a more timely approach to addressing low recruitment
  - Tier 4 Option A - ASMFC should not be allowed to defer action if a management trigger is tripped.
- 4.2 Rec Fishery Measures - closures have already been implemented in certain areas (Maine included, and our spawning population is a FRACTION of the Chesapeake and Hudson). Thus:
  - Option B
    - Sub option B2 and B2-b - Spawning areas must be closed so the stock can rebuild, and a no-targeting closure would provide the best protection for spawning females. The fact that fishing for an overfished species in critical spawn areas is even allowed is completely absurd.
  - Option C
    - Sub option C1 and C2 - will reduce recreational release mortality.
- 4.4 Rebuilding - this should have already been addressed but ASMFC dragged their feet.
  - 4.4.1 - Option B bases the rebuild plan on more accurate recruitment data.
  - 4.4.2 - Option B supports public involvement in the rebuilding process
- 4.6 Alternative State Management Regimes - conservation equivalency is a joke and should have never made it's way into striped bass regulation in the first place.
  - 4.6.2 - Sub option B1 limits the use of CE the most. CE should not be allowed in an overfished stock.

Thank you for your consideration.

Peter

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Peter Mohlin

[pmohlin@gmail.com](mailto:pmohlin@gmail.com)

207.294.2251

**From:** [bitemephil](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment 7  
**Date:** Wednesday, March 23, 2022 4:11:21 PM

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I am a 71 year old summer resident of KITTERY Maine. I fish the Piscataqua river watershed and the coastal water of southern Maine and New Hampshire. I have lived and fished through the near complete disappearance of stripers; through their resurgence post moratorium; through the steady decline as size limits were reduced and the current sharp decline, as environmental degradation and increased fishing pressure threaten this critical fishing resource.

I am in favor of a new moratorium on any harvesting of striped bass. The regulatory authorities and resultant interstate bickering for regional advantage are disheartening.

My grandchildren now fish with me on a regular basis, mostly targeting stripers. We do not “harvest” any striped bass. Without swift and bold action the tradition of families fishing together might soon be over in New England.

Phil Desfosses  
6034985411

Sent from my iPad

**From:** [Donald Ives](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass  
**Date:** Wednesday, March 23, 2022 3:22:41 PM

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I am 67 year old striper fishermen who has fished Delaware Bay and river my entire life I have seen the best and the worst of striper fishing in my opinion the Delaware Bay and River should institute a moratorium during spawning season from March 15 to June 15 no fish shall be harvested we need to protect spawning fish I'm tired of seeing the slaughter of big cows at Elsinboro point

Sincerely yours

Donald P Ives former treasure of Southern Region of NJSFSC

Sent from my iPhone

**From:** [Don Pirro](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7 for Striped Bass  
**Date:** Wednesday, March 23, 2022 2:53:06 PM

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Dear Emilie Franke and ASFMC,

Thank you for your efforts to improve the management of the precious resource of striped bass which has been in a sustained period of decline. I am a long time avid angler who lives in Virginia and regularly fishes for striped bass in both the Chesapeake Bay (MD and VA waters) as well as in the ocean in NJ. I am a member of Coastal Conservation Association in VA and practice conservation. I am also a scientist and consider myself to be an informed and involved member of society when it comes to fisheries management having also participated in the Marine Resource Education Program sponsored by the Gulf of Maine Research Institute. Here are my desired options for Section 4 in the Draft Amendment 7 document:

#### 4.1 Management Triggers

*Tier 1: Fishing Mortality (F) Triggers Sub Options: A1, B1, C1 (status quo)*

*Tier 2: Female Spawning Stock Biomass (SSB) Management Triggers Sub-Options: A2, B1, C2*

*Tier 3: Recruitment Triggers – Sub Option: A2, B2*

*Tier 4: Deferred Management Action – Option: A*

4.2.2 Measures to Address Recreational Release Mortality – Option: B1, B2-a, C, D2

4.4.1 Recruitment Assumption for Rebuilding Calculation – Option: B

4.4.2 Rebuilding Plan Framework – Option: B

4.6.2 Management Program Equivalency – Option: B1-a, B1-c, C3, D1

#### General Comments/Recommendations

- Draft Amendment 7 is a very comprehensive and complex document. I am pleased to see ASFMC attempting to use the best science to manage this fishery. Unfortunately I believe the document is below the average angler's reading comprehension level. A summary document that has been "dumbed down" significantly should have been provided so that most anglers would understand the options and issues at hand. Alternatively, breaking the document into smaller pieces with different timelines on responses due would have been preferable. Having real life examples use past data/scenarios would have helped tremendously.
- The period for public comment should have been extended for a document as complex as this. I attended the VA public hearing on this document in early March (much too soon after the release of the document) and was disappointed that only 33 people



participated. Had the comment period been extended another month or two so that VA residents, and various associations, had more time to review/comprehend and formulate an opinion, these public hearings would have been much more beneficial to all vs. checking the box that a public hearing was held.

Thank you for the opportunity to provide commentary.

Don Pirro

Centreville, VA

**From:** [Joe Gieger](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, March 23, 2022 1:16:02 PM

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I believe the best way to protect our striped bass population is to limit the size of fish taken. No more breeders allowed. Also you must protect their food source. No more netting of bunker!

It's that simple if you are serious

Regards  
Joe Gieger

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Sent from Gmail Mobile

**From:** [Lisa Eggie](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Management Input  
**Date:** Wednesday, March 23, 2022 10:23:57 AM

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Attention Managers,

I am completely in favor of a total moratorium effective immediately. I don't feel it needs to be 10 years, 5 would do it. The last time it was imposed, there were Bass everywhere at the end. I was an eye witness to this unprecedented resurgence of the population. Stop wasting time and resources with stop gap measures that do not work! I just hope its not already too late. The following fisheries have almost completely collapsed. Delaware Bay, in-shore Southern New Jersey, in-shore Virginia and North Carolina. The only viable fishery left in the mid-Atlantic comes from the "Hudson river" strain. Still good fishing in Raritan Bay south to Barnegat inlet. In the spring and fall these fish get pounded relentlessly by thousands upon thousands of fisherman day after day. Its common practice for boats to limit out, return to port, off load the fish and go back out for another limit. This is a prime reason "band aide" measures and limits are ineffective.

Until you folks wake up and implement a full moratorium, Bass populations will continue to decline. In the mean time, I am in favor of the following measures:

**\* MAKE STRIPED BASS A GAMEFISH ON THE ENTIRE EAST COAST!!!**

**\* ELIMINATE COMMERCIAL QUOTAS!!!**

- \* Smaller "over" size limit.
- \* Outlaw snag and drop treble hook fishing. (Mortality issue).
- \* Mandate all hooks to be barb less. ( We have had wonderful release success simply by crimping down the barb. (Mortality issue).
- \* Mandate all fish stay in the water when being released. (Mortality issue).
- \* Outlaw all gaffs. (Mortality issue)
- \* Outlaw all multiple hook trolling lures. Multiple fish get hooked simultaneously and are dragged by the boat to their death. Ridiculous!!! (Mortality issue).

\* Outlaw light tackle that cannot land a fish quickly. (Mortality issue).

CAPT. DUANE EGGIE  
5 Elizabeth Lane  
Ocean View, NJ 08230

**From:** [G2W](#)  
**To:** [Comments](#)  
**Subject:** Fw: [External] Striped bass amendment 7 comment.  
**Date:** Wednesday, March 23, 2022 9:33:37 AM

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**From:** Boston Fish <atownhomeservices@gmail.com>  
**Sent:** Tuesday, March 22, 2022 8:59 PM  
**To:** G2W  
**Subject:** [External] Striped bass amendment 7 comment.

Jeremy Furtado Commercial striped bass fisherman and charter captain out of Boston ma  
<https://Bostonfishcharters.com>



Boston Fishing Charters -  
Charter Fishing - Boston,  
Massachusetts

bostonfishcharters.com

Boston Fish Charters targets striped bass  
flounder and tuna . Located in downtown  
Boston we can pick you up anywhere in Boston  
Charter fishing specialist

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Thank you for the hearing unlike most of the people commenting I felt like it was onpoint . I  
am for spawning closures. I would also like to see "for hire " be a separate category. Not  
lumped in with the general public rec . Thank you for having the info that states recreational  
fisherman kill more bass every year then the com fleet . Thank you for all that you do .

**From:** [Bradford Burns](#)  
**To:** [Comments](#)  
**Cc:** [Patrick Keliher](#)  
**Subject:** [External] Amendment 7 Public Comments  
**Date:** Wednesday, March 23, 2022 5:48:49 AM

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My comments of Amendment 7 are that all of the options are too little, too complicated, and highly unlikely to stop the decline in striped bass. Given the declines that we have already seen in the spawning stock biomass, the only effective solution is a complete harvest moratorium. That is what should be enacted. It is a clean, simple solution that worked to bring us back from a similar problem in the early to mid-1980s. I lived and fished through that, and the as soon as the killing was stopped the fish started to come back.

Brad Burns Falmouth, Maine

**From:** [G2W](#)  
**To:** [Comments](#)  
**Subject:** Fw: [External] Comment for striped bass webinar  
**Date:** Tuesday, March 22, 2022 5:50:14 PM

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**From:** Joe B <joseph.beneventine@verizon.net>  
**Sent:** Tuesday, March 22, 2022 5:49 PM  
**To:** G2W  
**Subject:** [External] Comment for striped bass webinar

Hello,

I am an avid fisherman in the western Long Island sound area and my comment is as follows; while I am a firm believer in all of the conservation efforts you all have been putting on place to protect the fishery for future generations, I have to say that as far as I can see the striped bass population is at extremely healthy number levels here in the western Long Island sound. Any further efforts to protect stripe bass over and beyond the new slot limit of 28" to 35" is going to continue to endanger many other species of marine life since as I am sure you are aware stripe bass are extremely predatory and they do damage to juvenile flounder, fluke etc. as well as mantas shrimp which I know is a favorite food for them among other things they feed on. Last year 2021 I saw acres and acres of schoolie stripe bass that seemed to stretch for miles feeding here in the western saline

Just saying be careful tipping the scales too far in one direction.....

Sent from my iPad

**From:** [Al Williams](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, March 22, 2022 4:56:46 PM

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To: Emilie Frankie  
From : Al Williams

Subject: My comments regarding Atlantic Striped Bass draft amendment 7.

Background: I am a life long resident of Gloucester, Massachusetts. I have have fished for striped bass both commercially and recreationally for 55 plus years. I have read the contents of draft amendment 7 and submit the following comments:

Tier1 - Fishing mortality triggers

Option A / timeline to reduce F to target.

I favor option A2 - 2 years. (Allows time for added data as well as potential impacts and trends of other triggers)

Option B / F threshold trigger definition.

I favor option B2 - 2 year average F exceeds threshold (this will better account for variations in data year to year)

Option C / F target trigger definitions.

I favor option C1 (SQ) - F exceeds the F target for two consecutive years and female SSB is below SSB target in either year.

Tier 2 - SSB triggers

Option A / deadline to implement rebuilding plan

I favor option A1 - no deadline (SQ). (This allows flexibility surrounding minimal deviation from trigger that may naturally correct)

Option B / SSB threshold trigger trips if.

I favor option B1 (SQ) - SSB falls below the threshold (stock is overfished)

Option C / SSB target trigger trips if:

I favor option C1 (SQ) - SSB falls below SSB target for two consecutive years and F exceeds F target in either year.

Tier 3 - Recruitment trigger

Option A / Recruitment trigger definition:

I favor option A2 - Moderate sensitivity. (Would have tripped 3 times since 2003). (This increases sensitivity to low YOY numbers that are becoming more frequent and concerning)

Option B / Management response to recruitment trigger:

I favor option B1 - Most flexible response (SQ) The board reviews recruitment trigger data and determines appropriate action. (Options B2 and B3 = too complex)

,

Tier 4 - Deferred management action



Some flexibility in certain situations:

I favor option F - board has already initiated action (e.g. developing addendum) in response to a different trigger. This allows for more of a systems approach vs. knee jerk reactions to triggers.

Measures to address recreational release mortality:

Option A / Status Quo circle hook requirement

This should remain in place as defined for the recreational fishery.

Option B1 / Effort controls (seasonal closures)

I favor option B1-a - States select 2 week closure during a wave with at least 15 % of directed trips. (This is an unpleasant measure but in my opinion offers the only reasonable chance for meaningful impact vs just more gear definition and outreach education.)

Option B2 / Spawning area closures

I favor option B2-b - This appears to be highly flexible and offers a more surgical approach for states to apply the “no targeting” closures during spawning episodes.

Option C / Gear restrictions:

I favor both options C1 and C2. ( but my opinion is that these offer modest impact at best to recreational release mortality in the face of extraordinary effort)

Option D / outreach and education:

I favor option D1 -required outreach. (This is another common sense measure that may have difficulty achieving impactful results.)

#### Section 4.4. Rebuilding plan

Option for rebuilding calculations;

I favor option B - the low recruitment assumption. (In my opinion, environmental and climate change factors are conspiring to potentially make low recruitment the norm. Therefore I think it prudent this calculation be used until evidence suggests otherwise.)

Option for 2022 assessment response:

I favor option B - adjust measures to achieve F rebuild via board action. ( enabling the board to react in this manner may offer the opportunity to avoid 11th hour actions with delayed impact)

#### Section 4.6.2. Conservation equivalency

CE options:

I favor Option A (SQ) - board discretion. ( The use of CE has been controversial and the effectiveness of its application has often been challenged. The various options offered in this amendment are complicated and it’s hard to discern if they may resolve some or any of the issues. I prefer to defer to the judgement of the board on the application of CE. They know the issues and I opt to keep the CE application process “as is” for now.)

Closing comments:

The draft amendment 7 document was challenging in both volume and complexity. It contained many items for comment and most required some in depth understanding of the issues and data.

It took me the better part of an afternoon to compile the attached response.

I do understand the magnitude of amendment 7 and the need to capture all of the concerns in this one effort, but I would guess that detailed feedback from the average angler might be limited.

This was information overload. I can not remember anything this big and complicated on Striped Bass going out for public comment before.

Unfortunately, I know it has already been trimmed down, so I don't have any meaningful suggestion on how to make it easier for the average angler to digest.

I would like to thank all who are involved with this amendment's preparation and its presentation.

Thank you for accepting my comments

Al Williams  
Gloucester, Mass.

**From:** [Carl Johansen](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Tuesday, March 22, 2022 1:16:25 PM

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To those who may be making changes to the present regulations , lets try to see if the actual resource really matters and make all of the decisions on behalf of the fish . Peace and Prayers Carl Johansen 28 Oxford Road East Sandwich mass. 02537

**From:** [Nat Turbeville](#)  
**To:** [Comments](#)  
**Subject:** [External] striped bass  
**Date:** Tuesday, March 22, 2022 11:32:43 AM

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I urge the ASMFC to do everything possible to save the striped bass. This is an important fishery that has deteriorated remarkably in the past few years. The fishery should be totally closed to all if the commission thinks that is important to save it for future generations of Americans. Nathan Turbeville, 505 Kilmarnock Dr., Richmond, Va, 23229

**From:** [Tom Doyle](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, March 22, 2022 11:32:39 AM

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As a life-long fisherman and outdoors enthusiast, I support the protection of striped in anyway way possible. Any fisherman who spends time on the water can attest to the fact that the population is declining at an alarming rate. This shows current regulations are failing. In order to restore this world class fishery, a 10 year moratorium is needed for both commercial and recreational. This action clearly worked when the last moratorium was enacted. The population rebounded big time proving that this measure works.

The economic value of a living fish by far outweighs that of a dead one.

Please help support a moratorium to allow the fish population to return sustainable levels that we can all benefit from.

Thank you,  
Tom Doyle  
Dalton, MA

Sent from my iPhone

**From:** [Jack Kingston](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, March 22, 2022 11:14:00 AM

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Hi All,

General Comments:

It seems like there is a big disconnect between the angling community and the fisheries management decision makers that is complicated by disagreements among the various stakeholders.

The reality of the situation is that even though commercial, recreational, and "recremercial" stakeholders may disagree on management practices they all agree that fisheries management has failed us.

Regardless of who I speak with in our community, there is just no confidence left out there that the striped bass fishery will be managed properly. Everyone seems to have accepted that fisheries management will never restore the resource to abundance.

Criticism:

It seems deceitful to publicly state that form letters will not be valued as highly as those written in the public's own words. That policy sends a message that it is the intent of fisheries management to keep stakeholders unaligned and therefore easier to ignore.

Opinions:

Tier 1 Options Fishing Mortality (F) Triggers

**I support Sub-option A1**

**I support Sub-option B1**

**I support Sub-option C1**

TIER 2 OPTIONS: Female Spawning Stock Biomass (SSB) Management Triggers

**I support Sub-option A2**

**I support Sub-option B1**

**I support Sub-option C1**

TIER 3 OPTIONS: Recruitment Triggers

**I support Sub-option A3**

**I support Sub-option B2**

TIER 4 OPTIONS: Deferred Management Action

**I support Option A**

4.2 Recreational Fishery Management Measures

**I support Sub-option B2. Spawning Area Closures**

**I support Sub-option B2-b. No-Targeting Spawning Closure Required**

#### 4.6 ALTERNATIVE STATE MANAGEMENT REGIMES

**I think that conservation equivalence must be eliminated and the striped bass population needs to be managed for abundance because ... duh, we wouldn't be talking about this if the population was managed properly.**

Hopefully someone actually reads this. If nothing else I hope that people in fisheries management start to realize that people are unhappy and community participation in these events is low not because people don't care. Participation is low because people don't believe you are capable of doing your job. Please try to prove us wrong and do something you can be proud of.

Jack Kingston  
Recreational Angler  
Boston Massachusetts

**From:** [Craig Jordan](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, March 22, 2022 10:05:21 AM

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to: Emilie Franke  
Atlantic States Marine Fisheries Commission

cc: Michael Luisi, Acting Director, Fishing and Boating Services, Maryland DNR

Good Morning,

As a recreational striped bass angler, I have grown increasingly concerned about the status of the striped bass fishery. The inaction by the management board to address the declines over many years is equally concerning. However, I am encouraged by a perceived shift in angling culture and the outpouring of support for quick and meaningful action. I trust the management board will act quickly to rebuild the stock.

Please see below for my comments on Draft Amendment 7:

### **Management Triggers:**

Fishing Mortality Triggers:

Timeline to Reduce F to the Target, I support **Sub-option A1** (status quo), 1 year.

F Threshold Trigger, I support **Sub-option B1**(status quo): If F exceeds the threshold in a single year, action must occur to reduce F to the target within the timeframe selected under sub-option A (supported A1 above).

F Target Trigger, Support **Sub-option C1** (status quo) if F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, must reduce F to a level that is at or below the target within the timeframe selected under sub-option A (supported A1 above).

### **Spawning Stock Biomass Triggers**

Deadline to Implement a Rebuilding Plan, I support **Sub-Option A2**: Two-Year Deadline

SSB Threshold Trigger, I support **Sub-option B1**(status quo): Rebuild when SSB in a single year falls below the threshold.

SSB Target Triggers, **Sub-option C1** (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

### **Recruitment Triggers**

Recruitment Trigger Definition, I support **Sub-option A3**: The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model (NY, NJ, MD, VA) shows an



index value that is below the median of all values in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

Management Response to Recruitment Trigger, I support **Sub-option B2**. If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

Deferred Management Action, I support **Option A**. No deferred management action. Stock assessments following a management change should be scheduled to enable evaluation of two fishing years under the new management measures providing an opportunity for the population to react to the corrective management action while creating management stability for at least two years.

### **Measures to Address Recreational Release Mortality**

Seasonal closures, I support **Sub-options B2** Spawning Area Closures AND **Sub-option B2-b**. No-Targeting Spawning Closure Required. All recreational targeting of striped bass would be prohibited for a minimum two-week period on all spawning grounds.

Gear restrictions, I support **Sub-options C1 and C2**.

Outreach and Education, I support **Sub-option D1**. States are required to promote best striped bass handling and release practices by developing campaigns.

### **Rebuilding Plan**

Recruitment Assumption for Rebuilding Calculation, I support **Option B**. Use a low recruitment assumption for the 2022 stock assessment.

Rebuilding Plan Framework, I support **Option B**. Enable ASMFC to respond quickly through Board action.

Management Program Equivalency, I support **Sub-options B1, C3, D3, and E2**.

Thanks for your time,

Steve Jordan

**From:** [Evan Dintaman](#)  
**To:** [Comments](#)  
**Cc:** [MICHAEL LUISI](#); [Emilie Franke](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, March 22, 2022 10:03:59 AM

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to: Emilie Franke  
Atlantic States Marine Fisheries Commission

cc: Michael Luisi, Acting Director, Fishing and Boating Services, Maryland DNR

Good Morning,

As a recreational striped bass angler, I have grown increasingly concerned about the status of the striped bass fishery. The inaction by the management board to address the declines over many years is equally concerning. However, I am encouraged by a perceived shift in angling culture and the outpouring of support for quick and meaningful action. I trust the management board will act quickly to rebuild the stock.

Please see below for my comments on Draft Amendment 7:

### **Management Triggers:**

Fishing Mortality Triggers:

Timeline to Reduce F to the Target, I support **Sub-option A1** (status quo), 1 year.

F Threshold Trigger, I support **Sub-option B1** (status quo): If F exceeds the threshold in a single year, action must occur to reduce F to the target within the timeframe selected under sub-option A (supported A1 above).

F Target Trigger, Support **Sub-option C1** (status quo) if F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, must reduce F to a level that is at or below the target within the timeframe selected under sub-option A (supported A1 above).

### **Spawning Stock Biomass Triggers**

Deadline to Implement a Rebuilding Plan, I support **Sub-Option A2**: Two-Year Deadline

SSB Threshold Trigger, I support **Sub-option B1** (status quo): Rebuild when SSB in a single year falls below the threshold.

SSB Target Triggers, **Sub-option C1** (status quo): If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

### **Recruitment Triggers**

Recruitment Trigger Definition, I support **Sub-option A3**: The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model (NY, NJ, MD, VA) shows an

index value that is below the median of all values in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

Management Response to Recruitment Trigger, I support **Sub-option B2**. If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

Deferred Management Action, I support **Option A**. No deferred management action. Stock assessments following a management change should be scheduled to enable evaluation of two fishing years under the new management measures providing an opportunity for the population to react to the corrective management action while creating management stability for at least two years.

### **Measures to Address Recreational Release Mortality**

Seasonal closures, I support **Sub-options B2** Spawning Area Closures AND **Sub-option B2-b**. No-Targeting Spawning Closure Required. All recreational targeting of striped bass would be prohibited for a minimum two-week period on all spawning grounds.

Gear restrictions, I support **Sub-options C1 and C2**.

Outreach and Education, I support **Sub-option D1**. States are required to promote best striped bass handling and release practices by developing campaigns.

### **Rebuilding Plan**

Recruitment Assumption for Rebuilding Calculation, I support **Option B**. Use a low recruitment assumption for the 2022 stock assessment.

Rebuilding Plan Framework, I support **Option B**. Enable ASMFC to respond quickly through Board action.

Management Program Equivalency, I support **Sub-options B1, C3, D3, and E2**.

Thanks for your time,  
Evan Dintaman  
Maryland

**From:** [Dave Cannistraro](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment 7  
**Date:** Tuesday, March 22, 2022 9:14:13 AM

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To:

Emilie Franke  
FMP Coordinator  
1050 N. Highland Street  
Suite 200 A-N  
Arlington, Virginia 22201

Good Morning

I attended the Massachusetts meeting last night and I am at a loss with the management of the striped bass. The data you provided about mortality rates looks like something you pulled out of your hat. I believe the ASMFC is a puppet of the commercial fishing industry. Your interest is not in keeping a healthy stock of stripers but rather making sure the commercial sector remains profitable.

Please prove me wrong here and make stripers like the sturgeon in Florida where they are a game fish and catch and release only for everyone. Until then we will continue to see a decline in the striped bass populations and a collapse to come.

Dave Cannistraro  
Massachusetts

**From:** [John Pinkman](#)  
**To:** [Comments](#)  
**Subject:** [External] Rockfish Limit  
**Date:** Tuesday, March 22, 2022 9:08:16 AM

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I have been fishing in the bay for decades with my own boat. I've seen the decline. I support the most strenuous and strict enforcement of limitations. However if you are not going to enforce this, you're wasting your time with the legislation. At that point would only amount to a public relations effort.

John Pinkman  
Sent from my iPhone

**From:** [Steve O13](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Monday, March 21, 2022 9:24:10 PM

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Striped bass need our help. As a young kid I want to catch these fish for a long time. It truly worries me the state these fish are in now. I sincerely hope that the spawning data is looked at because these fish need to be protected.

**From:** [G2W](#)  
**To:** [Comments](#)  
**Subject:** Fw: Comment on statistical analysis  
**Date:** Monday, March 21, 2022 8:42:15 PM

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**From:** Joseph Dannenfelser <outlook\_EDD1437FE9503EED@outlook.com>  
**Sent:** Monday, March 21, 2022 8:33 PM  
**To:** G2W  
**Subject:** [External] Comment on statistical analysis

Two terms apply to any statistical analysis: “validity” and “reliability.” Validity refers to the ability to gather data that measures what you think it does. Reliability refers to replicability of data. Your data on release fatality has a serious validity shortfall when it includes the charter fishery with recreational fishery. Doing so is based on the assumption that success rates between charter fisheries and periodic recreational fishermen are about the same. In my belief charter success rates are many times that of the occasional fishermen.

Sent from [Mail](#) for Windows

**From:** [G2W](#)  
**To:** [Comments](#)  
**Subject:** Fw: [External] Striped bass Amendment 7  
**Date:** Monday, March 21, 2022 8:34:38 PM

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**From:** J T <[zoemetrieffie@gmail.com](mailto:zoemetrieffie@gmail.com)>  
**Sent:** Monday, March 21, 2022 7:25 PM  
**To:** G2W  
**Subject:** [External] Striped bass Amendment 7

Dear commission,

I hope this email finds you well. I've been striper fishing for as long as I can remember I am passionate about the fishery and I understand what a economic value it is both commercially and recreationally.

The striped bass fishery as we all know has been on a sharp decline and I hope back door politics and lobbyists do not interfere into what is at stake.

As a recreational fisherman I am all for a proposal of catch and release only. Also poaching must be severely punished for both commercial and recreational fisherman. Fines that are in place now are much too lenient. I don't know if it's possible but all states must adhere to the same rules there are too many variables. Banning of certain fishing grounds when the stripers are spawning but also help.

Lastly and most importantly the fish dragger and netters have to be held accountable there must be a way for all this byproduct that they are dumping back into the ocean can be dealt with it's an absolute massacre in a different level they are raping our oceans there must be a more sustainable way.

Sincerely  
John Tombros  
188 Oak St  
Pembroke MA 02359



**From:** [Mark](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass  
**Date:** Monday, March 21, 2022 7:41:05 PM

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Show some courage and leadership to do what it takes to preserve the future of the striped bass.

**From:** [John Perrone](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Monday, March 21, 2022 6:40:28 PM

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Hi my name is John and I am a MA resident but fish the entire Atlantic coast. I love the Atlantic striped bass and am afraid of it's population reaching a record low, and potentially worse if we do not do anything about it.. I believe both recreational and commercial are to blame. I have worked on a Gill netting boat for the commonwealth and saw with my own eyes massive striped bass dead or dying from the nets.. most fish well exceeded over 15 pounds all old enough to spawn... me being young and afraid of the captain losing his license and me losing my job I kept my mouth shut.. and know if other guys who did the same.. on the recreational side I know the mishandling of juvenile striped bass results in an extremely high mortality rate. I don't exactly know what needs to be done but Amdmnt 6 did not do it..in fact (in my opinion) it made things worse.. I think the result of stricter rules of breaking the laws would result in more anglers to be more aware but this would lead to more officers regulating The rules with higher fines (\$\$) if found breaking the rules...in proper release of the fish, not fishing in heavy spawning areas etc

Sent from my iPhone

**From:** [Emilie Franke](#)  
**To:** [Comments](#)  
**Subject:** FW: [External] Striped Bass Amendment 7 Input  
**Date:** Monday, March 21, 2022 9:20:27 AM

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**From:** Michael Bady [mailto:racerock166@aol.com]  
**Sent:** Saturday, March 19, 2022 4:29 PM  
**To:** Emilie Franke <EFranke@asmfc.org>  
**Subject:** [External] Striped Bass Amendment 7 Input

Emilie Franke  
Atlantic States Marine Fisheries Commission  
1050 North Highland St., Suite 200 A-N  
Arlington, VA 22201

March 19, 2022

Dear Emilie,

Thank you very much for your presentation at this past Wednesday's Public Input Meeting held at the NYS DEC office. I believe that the complexity of many of our fishery's regulations can make pertinent input difficult, at times. However, between your explanation and the summary document handed out at the meeting I feel better prepared to offer my specific input. I also feel that anything that can be done in the future to make the proposed changes in regulations easier to understand will benefit everyone.

Although I offered a general statement about the direction I feel the board should go with Amendment 7, here are my specific requests by category:

#### Management Triggers

- Tier 1 Fishing Mortality: Option A2, B2, C1
- Tier 2 SSB Triggers: Option A2, B1, C1
- Tier 3 Recruitment Trigger: Option A3, B3
- Tier 4 Deferred Management Action: Option A

Recreational Release Mortality: Option A, B1-a, B2-a, C1, D2

#### Rebuilding Plan:

- Recruitment Assumption for 2022 Assessment: Option A
- Process of Responding to 2022 Assessment: Option A

Conservation Equivalency

Option B1-a, B2-a, C1, D2, E2

I believe we are all aiming for the same goal, to protect the resources of our oceans and waterways for all to share and enjoy. Thanks, again, for the opportunity to comment.

Sincerely,

Capt. Mike Bady

Captain's Table Charters

Greenport, NY

516-317-5423 cell

[racerock166@aol.com](mailto:racerock166@aol.com)

**From:** [Daniel Dearstyne](#)  
**To:** [Comments](#)  
**Cc:** [ddearsty@nycap.rr.com](mailto:ddearsty@nycap.rr.com)  
**Subject:** [External] Re concerns Draft amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass  
**Date:** Sunday, March 20, 2022 11:19:23 AM

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Letter to Atlantic states marine fisheries committee [comments@asmfc.org](mailto:comments@asmfc.org)

This letter concerns Draft amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass

Comment regarding actions to reduce or prohibit fishing for striped bass on the Hudson River estuary

My name is Dan Dearstyne, and I'm a 64 year old, life long resident of New York State. Since my 20s, I've fished recreationally for striped bass in the northern Hudson River, between Catskill Creek and the Troy Dam. During those years, I've witnessed changes to the regulations regarding this fishery, along with changes to many other sporting seasons, bag and creel limits, allowable methods of angling, etc. I have always tried to champion these efforts with my fellow sportsman as positive efforts to proactively protect and preserve our fisheries.

In the past 15 years, I've been a member of the Castleton Boat Club in Castleton-on-Hudson and have served in many offices, including vice-commodore and commodore. I am now a past commodore of the club. Due to the close boating proximity of our club to the Troy Federal Lock (impassable by migrating fish), I believe that I have gained a more than basic insight into the thoughts and feelings of our local river anglers. I do not pretend to speak for them, but I hope that I do.

The sport fishing activities on the Hudson River during this short season not only provide resident sportsman with a unique and possibly world class angling experience, but it has become a staple sporting season for countless anglers who have invested, sometimes extensively, not only years of time but a great deal of personal financial resources to pursue this sport.

I believe that I understand the feelings and mind-sets of my fellow anglers on the river. I truly think that the last thing that needs to happen here is a prohibition of angling for striper bass, in part because it will NOT help to enlist the positive support of law abiding, ethical sportsmen and women with efforts to improve the fishery. These people clearly understand that there are other activities that harvest these bass, and most likely impact the fishery in a negative way that far exceeds damage to the breeding stock that could be inflicted by sports fisherman.

**I do not endorse the suggestion that a total prohibition of sport fishing for striped bass in our Hudson River estuary will be a practical step forward in the effort to encourage population growth in the species.**

**I do endorse a catch and release only approach to this fishery.** I believe that it would be tolerated by the same sportsman who would react negatively to a fishing ban. My experience with other

anglers with regards to what has become a gradual “catch and release” mindset over the past several decades leads me to believe that these catch and release concepts are better accepted by sportsman than a more heavy handed, “you’re not allowed to do this at all” approach.

Finally, I do not believe that the current law enforcement fleet on the Hudson river is capable of successfully stopping all striped bass angling activities over this huge stretch of water. I respect them and their efforts, but there are simply not enough people to do it. There are, in my opinion, enough officers to continue the casual observations on the water necessary to determine if someone is illegally keeping fish against an active catch and release ruling.

Thank you for your consideration.

Dan Dearstyne dandearstyne@gmail.com

Sent from [Mail](#) for Windows

**From:** [JENNIFER MORGAN](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Sunday, March 20, 2022 9:38:58 AM

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My experience- 23 years surfcasting south shore of Long Island.

Large breeding females as part of seasonal catch and release have continued to significantly decline over recent years; while the number of people fishing has grossly, exponentially increased, for lack of a better term, skyrocketed.

**The time to act is now.** This much effort and concern for this natural resource brought forth by ASMFC

mandates -- **striped bass should now be a GAME FISH!**

Sincerely,

J. Todd Morgan M.D.

**From:** [JT](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped bass amendments  
**Date:** Saturday, March 19, 2022 6:27:24 PM

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Dear commission,

I hope this email finds you well. I've been striper fishing for as long as I can remember I am passionate about the fishery and I understand what a economic value it is both commercially and recreationally.

The striped bass fishery as we all know has been on a sharp decline and I hope back door politics and lobbyists do not interfere into what is at stake.

As a recreational fisherman I am all for a proposal of catch and release only. Also poaching must be severely punished for both commercial and recreational fisherman. Fines that are in place now are much too lenient. I don't know if it's possible but all states must adhere to the same rules there are too many variables. Banning of certain fishing grounds when the stripers are spawning but also help.

Lastly and most importantly the fish dragger and netters have to be held accountable there must be a way for all this byproduct that they are dumping back into the ocean can be dealt with it's an absolute massacre in a different level they are raping our oceans there must be a more sustainable way.

Sincerely  
John Tombros  
188 Oak St  
Pembroke MA 02359



**From:** [kholmes9290@gmail.com](mailto:kholmes9290@gmail.com)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Comments  
**Date:** Saturday, March 19, 2022 2:03:29 PM

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To whom it may concern....

Did this actually happen? I am hearing there was a crucial and potentially devastating public hearing concerning the future of striped bass management in our waters without any effort to invite representatives from the party/charter industry. You know, those people whose lives depend on this fishery. Those people who pay DEC every year for permission to operate. Those people who spent countless hours filling out required paperwork for DEC. Those people who provide a service for those who cannot afford their own boat, gas, marina, insurance but might want to go fishing and see their daughter land their first Long Island striped bass.

To leave us out of a meeting of such importance is criminal and I and many in the industry feel betrayed and outraged with the way that meeting was conducted and the tone in that room in which a narrow and selfish user group attempted to speak for all user groups and stake holders in this fishery.

To be crystal clear, the majority of NY fishermen do NOT agree with the radical ideas presented at this seemingly closed door meeting. We demand an immediate hearing (with some notice) so that members of ALL user groups and stake holders can be fairly represented.

The lack of communication with us is disturbing.

**WE SUPPORT STATUS QUO** for the recovering striped bass fishery.

Sincerely,

Capt Ken Holmes  
Brooklyn Girl Fishing, Inc.  
Orient Pt, NY

Sent from my iPhone

**From:** [Jerry T.](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment 7  
**Date:** Saturday, March 19, 2022 1:29:49 PM

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I support the positions of Stripers Forever and their correspondence on Draft amendment 7. This is a very complex document that I, unfortunately, don't have the time to read through completely. But my opinions are aligned with Stripers Forever and I second anything they put forth regarding this matter.

I will say on my behalf that I am an avid angler of striped bass and spend hundreds of hours each year on the water recreationally fishing on the North Shore of the Boston area. I have kept logs over the years and I have seen decreases in total catches (I practice safe catch and release) and large decreases in the number of "keeper size" fish I land each season over the past 13 years.

The ASMFC must act swiftly to protect, save and rebuild this unbelievably precious species. I understand that there are many interests competing for this natural resource. But ultimately, without strong action on your part, there will be no resource left for any of us soon.

Respectfully,

Jerry Talleri  
Manchester By The Sea, MA

**From:** [Colin Halliday](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass MGMT input  
**Date:** Saturday, March 19, 2022 12:01:37 PM

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I am 100% in favor of a total moratorium effective immediately for striped bass. I have recently started fishing over the past few years and I can already plainly see what is happening to this species, as well as others. I have witnessed people keeping WAY more fish than they are supposed to, handling the fish incorrectly when bringing them to the boat, and just plain stupidity by humans. As we all know striper are a prize fish that provide a thrill like no other when you hunt them, find them, and land them! I am afraid that my 8 year old son who loves to fish wont be able to experience the 5 am wake up call in ice cold conditions to go find a 40 pound bass because we as adults can't seem to imply simple common sense. These fish need a break. If things keep going the way they are going no one will be able to keep stripers in the future because we will wipe them out. Please let the species grow.. Help the fish out for a little while... I'd like to take my son out in 5 years and have him share the same experiences that were all fortunate enough to enjoy!

--

Very Sincerely,

Colin Halliday- Broker Associate/ Manager  
Berger Realty 17th  
Cell:609-335-6702  
Email: Ceh@BergerRealty.com

\* Please leave me a Google or Yelp review! It is greatly appreciated."

[Leave a review on GOOGLE](#)

[Leave a review on YELP](#)

**From:** [TROY EGGIE](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass management input  
**Date:** Saturday, March 19, 2022 11:31:32 AM

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I am completely in favor of a total moratorium effective immediately. I don't feel it needs to be 10 years, 5 would do it. The last time it was imposed, there were Bass everywhere at the end. I was an eye witness to this unprecedented resurgence of the population. Stop wasting time and resources with stop gap measures that do not work! I just hope its not already too late. The following fisheries have almost completely collapsed. Delaware Bay, in-shore Southern New Jersey, in-shore Virginia and North Carolina. The only viable fishery left in the mid-Atlantic comes from the "Hudson river" strain. Still good fishing in Raritan Bay south to Barnegat inlet. In the spring and fall these fish get pounded relentlessly by thousands upon thousands of fisherman day after day. Its common practice for boats to limit out, return to port, off load the fish and go back out for another limit. This is a prime reason "band aide" measures and limits are ineffective.

Until you folks wake up and implement a full moratorium, Bass populations will continue to decline. In the mean time, I am in favor of the following measures:

- \* Smaller "over" size limit.
- \* Outlaw snag and drop treble hook fishing. (Mortality issue).
- \* Mandate all hooks to be barb less. ( We have had wonderful release success simply by crimping down the barb. (Mortality issue).
- \* Mandate all fish stay in the water when being released. (Mortality issue).
- \* Outlaw all gaffs. (Mortality issue)
- \* Outlaw all multiple hook trolling lures. Multiple fish get hooked simultaneously and are dragged by the boat to their death. Ridiculous!!! (Mortality issue).
- \* Outlaw light tackle that cannot land a fish quickly. (Mortality issue).

Troy Eggie

Berger Realty: 17th & Boardwalk

Office: 609-391-0500

Cell: 609-425-0992

Fax: 609-399-0317

Email: [troyeggie@comcast.net](mailto:troyeggie@comcast.net)

Work email: [tde@bergerrealty.com](mailto:tde@bergerrealty.com)

**From:** [O Leyva](#)  
**To:** [Comments](#); [Maureen Davidson](#); [Emerson Hasbrouck](#); [James Gilmore](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Saturday, March 19, 2022 10:42:59 AM

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I am writing to comment on the Draft Amendment 7.

**I support:**

**Tier 1 Option A: Sub-option A1 (status quo)**

**Tier 1 Option B: Sub-option B1 (status quo)**

**Tier 1 Option C: Sub-option C1 (status quo)**

**Tier 2 Option A: Sub-option A2**

**Tier 2 Option B: Sub-option B1 (status quo)**

**Tier 2 Option C: Sub-option C1 (status quo)**

**Tier 3 Option A: Sub-option A2**

**Tier 3 Option B: Sub-option B2**

**Tier 4 Option A: (status quo) *NO DELAY!***

**4.2.2 Sub-option C1, Sub-option C2, Sub-option D2**

**4.4.1 Option B**

**4.4.2 Option B: *You must act there's no time to lose***

**4.6.2 Option B: Sub-option B1-a. *End CE until the biomass is ABOVE the threshold!***

**4.6.2 Option C: Sub-option C3**

**4.6.2 Option D: Sub-option D2**

**4.6.2 Option E: Sub-option E2**

It is time to act. No more delays. Let's do the right thing.

O Leyva Jr.  
Brooklyn, NY

**From:** [Seymour Lebowitz](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass  
**Date:** Saturday, March 19, 2022 8:50:53 AM

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PLEASE crate at least a one year moratorium on fishing for one of our most valuable salt water game fish to keep it preserve for our children.. PLEASE save the Stripers ... Thanks for reading my cry for help, Sy..

Sent from [Mail](#) for Windows



Virus-free. [www.avg.com](http://www.avg.com)

**From:** [Riley Saxton](#)  
**To:** [Comments](#); [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Saturday, March 19, 2022 1:23:28 AM

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Dear ASMFC Staff,

Thanks very much for accepting public input, and all the hard work you've done drafting this bill. I'd just like to say that overall I think the changes you're making will be very beneficial, and especially with measures such as gear restrictions, making more sensitive management triggers, and the reform of Conservation Equivalency are all great steps to rebuilding the striper population. Thanks again for considering, remember to not be the bad guys, and have a good day!

Sincerely,

Riley Saxton



**From:** [A Thomas Leggett Jr](#)  
**To:** [Comments](#)  
**Subject:** [External] Restoring an Iconic Fish with Amendment 7  
**Date:** Friday, March 18, 2022 4:05:54 PM

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Dear ASMFC Fishery Management Plan Coordinator Emilie Franke,

Do away with catch and release!!!!!!!!!!!!!!!

Sincerely,  
A Thomas Leggett Jr

**From:** [Mike Piper](#)  
**To:** [Comments](#)  
**Cc:** [Dan Mckiernan](#); [Sarah Ferrara](#); [Raymond Kane](#); [michael.armstrong@mass.gov](mailto:michael.armstrong@mass.gov)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, March 18, 2022 12:23:09 PM

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To the ASMFC board,

I am writing to you as a recreational fisherman from Massachusetts. My kids and I fish regularly from shore, kayak and boat near Cape Ann as well as in Rhode Island. Over the past ten years, we've noticed a marked decrease in the number of striped bass we've seen and caught. There seem to be pockets of larger fish offshore, but inshore its fairly limited to schoolies in the spring and fall. I am glad to see you are taking the issue seriously and have decided to implement some steps to bring this great fish back to abundant levels. Below are my thoughts on some of the decisions that you face.

Sincerely,  
Mike Piper  
Marblehead, MA

#### 4.1 Management Triggers

Tier 1 Option A – I support sub option A1 as we cannot delay recovery any further.

Option B – I support sub option B1 for the same reason.

Option C – I support sub option C1 as SSB is also important to consider at the same time as F. I believe Targets have mostly been ignored in the past.

Tier 2 Option A – I support sub option A2 as two years seems enough time to implement a rebuilding plan.

Option B – I support sub option B1 and hope that the ten year plan has greater than a 50% chance of success.

Option C – I support sub option C1 as SSB works together with F. Again, I hope Targets are not ignored like they have been in the past.

Tier 3 I have no opinion on Recruitment levels yet, as I have not studied what causes poor recruitment.

Tier 4 Option A – I support status quo, no deferred management action.

#### 4.2 Recreational Fishery Management

Option B – I am in favor of sub option B2-b. Targeting in and around spawning times and areas is for selfish glory hounds. It should be both looked down upon and banned.

Option C – I support both sub option C1 and C2. These are common sense and I'm glad Massachusetts has already moved forward on these.

Option D – I support sub option D2. I am pro angler education but am not in favor of generating more mandatory work for our overworked and underfunded fisheries departments.

#### 4.4 Rebuilding Plan

4.4.1 Recruitment – I support Option B. We've been delayed by COVID and states abusing CE, so we need to keep 2029 as the goal. Low recruitment, whatever the causes, is real and should be accounted for.

4.4.2 Framework – I support Option B. Recovery has been delayed, so giving the Board authority to move quicker is warranted.

#### 4.6.2 Conservation Equivalency

Option B – I support sub option B1. I would prefer to see CE mostly eliminated, but this is the best option provided to limit abuses that we all have seen happen in the past.

Option C – I support sub option C3. Again, we've seen abuses in the past, this would help minimize some of them.

Option D – I support sub option D3. While a 50% buffer may seem extreme, we are in a crisis. Perhaps once stocks have recovered we could change this to 25%.

Option E – I support sub option E2. With CE being allowed, we can't have it throw our whole rebuilding effort and all the work done by the Staff. This helps ensure the overall fishery math works.

**From:** [Robert Goetz](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Management  
**Date:** Friday, March 18, 2022 9:59:36 AM

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Dear Sirs,

Please do the best you can to keep this species from fading away.

I don't fully understand all the ramifications of the policies you are fostering but I do know that striped bass recreational fishing is an incredible sport that needs to be protected.

Thank you.

Robert Goetz  
Huntington, NY

**From:** [Thomas Cody](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, March 18, 2022 9:26:52 AM

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Dear Council,

I am writing to comment on Striped Bass Amendment 7. I have pursued striped bass since I was 10 years old and I am deeply concerned about the current state of the fishery. Frankly, I am disappointed that the ASMFC's reluctance to act in the past has brought the fishery to the point where serious rebuilding is needed. I began fishing in the midst of the striped bass recovery of the late nineties and early 2000s and am saddened that I may not be able to share with my son the same experiences I had growing up on the striper coast. The stock is clearly being overfished and steps must be taken to ensure the health of the stock (particularly the 2015 year class) and an abundance of striped bass. I hope that the council will take the steps needed to protect this fishery for the sake of all who participate in it. To fail now would be an embarrassment; one that would all but wipe out the incredible legacy left by those who helped bring back the striped bass some thirty years ago.

Below I have listed which options in Amendment 7 I support. Thank you for your time and for listening to the voice of the anglers who love and care about this fishery.

#### 4.1 Management Triggers

Tier 1:

- Option A: **I support Sub-Option A1**
- Option B: **I support Sub-Option B1**
- Option C: **I support Sub-Option C1**

Tier 2:

- Option A: **I support Sub-Option A2**
- Option B: **I support Sub-Option B1**
- Option C: **I support Sub-Option C1**

Tier 3:

- Option A: **I support Sub-Option A2**
- Option B: **I support Sub-Option B2**

Tier 4:

- **I support Option A:** The council has already delayed far too long. Any further delays would risk the future of the fishery.

#### 4.2.2 Measures to Address Recreational Release Mortality

- Option C: **I support Sub-Option C1**

- Option C: **I support Sub-Option C2**
- Option D: **I support Sub-Option D2**

#### 4.4 Rebuilding Plan

- **I support Option B** rebuilding under a low recruitment regime

#### 4.4.2 Rebuilding Plan Framework

- **I support Option B**

#### 4.6.2 Management Program Equivalency

- Option B: **I support Sub-Option B1-a**
- Option C: **I support Sub-Option C3**
- Option D: **I support Sub-Option D2**
- Option E: **I support Sub-Option E2**

Sincerely,  
Thomas Cody

**From:** [Alan](#)  
**To:** [Comments](#)  
**Cc:** [Maureen Davidson](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, March 17, 2022 8:20:51 PM

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Good evening...i've been following this subject since its been on the table ...

ITS TIME ACT RESPONSIBLY:

The ASMFC must act now and follow conservative minded recommendations to restore and rebuild the SSB and the overall population of Striped Bass levels to one of size AND abundance within 5 years, not 7 years.

I support immediately a universal slot limit of 32 -36 " up and down the entire Atlantic Coast,

I support the protection of healthy year classes of fish as we had in 2015. Raise the size limit NOW !!!!

I support seasonal closures if necessary in areas that are overfished.

I support keepers size limits increased if goals aren't met .

I support management triggers that can't be ignored when SSB and the overall stock aren't met so we can rebuild to one of size and abundance.

I support all the recommendations of the ASWGA and there efforts to rebuild and maintain the SSB and overall stock of this fishery. I stand with there positions wholeheartedly.

We must rebuild the SSB with strict measures today , and to ensure a positive future for the fishery , without changing course . I support all immediate actions to preserve , rebuild , and protect the Striped bass fishery.

I implore you to listen to the those of us who want to rebuild and maintain f this fishery no matter what it takes.

Every fisherman or woman is responsible, as well as the ASMFC, to protect the striped Bass population, through better public policy , better education on conservation , we all have a common goal here, we can do this.

Thank you for listening

Alan Berger  
Assistant Director  
516-647-1391  
[bergersmac@gmail.com](mailto:bergersmac@gmail.com)



**From:** [DENNIS O](#)  
**To:** [Comments](#)  
**Subject:** [External] striped bass regs  
**Date:** Thursday, March 17, 2022 8:05:40 PM

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Please keep or strengthen current regulations to ensure the recovery of the striped bass population, and address the amount of illegal activities around the sale and poaching of striped bass.

Thank you

Sent from [Mail](#) for Windows

Dennis O'Driscoll

**From:** [Michael Lettieri](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, March 17, 2022 5:47:45 PM

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To the Commission,

When I was a kid some 30 years ago, there were practically no striped bass in the waters we fished. I knew about bluefish, and caught them, but looking back the ocean felt somehow empty - it was a place where something was missing. I remember vividly when schoolie stripers returned, and the joy that fishery brought. It was the struggle to protect that stock, which felt so fragile, that turned a 10 year old kid into a conservationist. Now, as a parent, I'm afraid that my kids will once again confront an ocean empty of life. That is why I'm writing.

On Issue 3: Recruitment must be used as a management trigger, and that trigger must be set at a meaningful level. If populations in nursery areas are not robust, action must be taken immediately to protect the entire population and allow it to rebound. The timeframe for management triggers must respond to the needs of the fish population, not the needs of anglers: they must be adjusted annually.

On Issue 4: A rebuilding plan must use a low recruitment assumption and allow for aggressive management action by the board. It is unconscionable that we would risk a population crisis by acting with insufficient urgency.

On Issue 6: It is essential that reforms be made to strengthen conservation equivalency rules based on stock status and increase accountability for states, particularly to protect spawning populations. CE should not allow states to set rules that undermine management efforts and harm the common good by allowing excessive harvesting of spawning class fish.

Sincerely,  
Michael Lettieri

**From:** [Mike Fatse](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [WILLIAM HYATT](#); [ROBERT LAFRANCE](#); [Justin Davis](#); [Rep. Melissa Ziobron](#); [Sen. Craig A. Miner](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, March 17, 2022 3:41:19 PM

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First, I have to say THANK YOU to the ASGA for the work and effort being put forth to curb the destruction of Striped Bass stocks from short sided legislation, careless over fishing and the belief that it's OK to catch and keep stripers of any size while the numbers are going in the wrong direction.

Im a 62 year old man who loves to fish my life with Stripers is pretty simple, as a kid they where the stuff of books and legend, and not easy to find. As I got to my 30's and 40's they where more abundant but still not always around in my 50's fishing got better and knowledgable fishers could expect to find fish.

Although I do not remember exactly when it was enacted in my opinion the best legislation during my life time was a total moratorium on the killing of Striped Bass as it allowed the stocks to replenish and rebound. I think the legislation in the years following the moratorium went in the wrong direction and has put us back into another crisis situation.

I urge our CT board members and the legislatures of all the marine states to truly look at what is happening and take action to curb the commercial quotas for both charter boats and commercial fishers.

In my opinion its time to realize the benefits to the populace in general and not just the commercial participants in the fishery. Shop owners, recreational fisherman who catch and release and guides who run catch and release only boats would welcome a measure to give Striped Bass game fish status.

I truly hope changes are made that improve the stocks so I can fish for Striped Bass with my grand children for years to come.

Thank you,  
Mike Fatse  
Sandy Hook CT, 06482



Mike Fatse  
RTO Group  
170 Post Road  
Suite 211  
Fairfield, CT 06824  
203.254.9544  
203.650.1359 cell  
[mikef@rtogroup.com](mailto:mikef@rtogroup.com)

[www.rtogroup.com](http://www.rtogroup.com)

WE THINK BEYOND INK!

**From:** [Breslin, James P.](#)  
**To:** [Comments](#)  
**Subject:** [External] Striper Fishing in NJ  
**Date:** Thursday, March 17, 2022 2:39:33 PM

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Dear Sir/Madam

I am totally against closing the Striped Bass fishing season for any amount of time. You need to come up with alternate measures to secure the Striped Bass Fishery. Maybe banning all commercial fishing of the most important recreational fish that exists.

Jim Breslin

[Jim Breslin](#)  
[518Boulevard](#)  
[New Milford, NJ 07646](#)  
[551 486 7599](#)

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**From:** [bekelly0705@gmail.com](mailto:bekelly0705@gmail.com)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, March 17, 2022 1:22:37 PM

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I am in support of Draft Amendment 7 – as every effort needs to be made to restore a healthy population of striped Bass that are a valued East Coast resource, Economically & Recreationally . Now is the time to act before the situation erodes.

Thanks,

Brian Kelly – Concerned Citizen

Wethersfield, Conn

**From:** [John Papciak](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, March 17, 2022 1:20:14 PM

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Emilie Franke, FMP Coordinator, at 1050 N. Highland St., Suite 200 A-N, Arlington, Virginia 22201; 703.842.0741 (fax)

March 16, 2022

comments@asmfc.org  
Subject line: Amendment 7

Dear Ms Franke,

We are being asked to provide public commentary as the Striped Bass Amendment 7 document moves to completion. I have read through the 149-page document. While there is much detail, I remain disappointed at the unwillingness of the Commission to explain to the public precisely how ASMFC let it's flagship species become depleted, despite the extensive monitoring that has taken place over the last 30 years.

- There is no recognition of the potential conflict-of-interest of among Commissioners.
- There is no analysis of the non-binding legal framework, which allows Commissioners to regularly discard scientific recommendations.
- There are still no educational or training requirements for Commissioners, which leads to willful ignorance of the biological drivers behind any such fishery.
- There still has been no analysis of 'lessons learned,' to explain to the public exactly how we got to a place where triggers were not recognized, and 'conservation equivalency' loopholes were awarded with no means to track the impact.

Now we are being asked to opine on a complex set of management triggers, despite evidence that some triggers were not heeded in the past.

Furthermore, the public has been given no information on the magnitude of harvest reductions needed to salvage any possibility of rebuilding the stock under a standard 10 year window.

Below I offer my specific comments on this document. Overall, I am asking for the most decisive actions to restore the striped bass population within the remaining time under the original 10 year window.

Sincerely

John W Papciak  
Montauk, NY  
USCG Licensed Charter Captain

#### 4.1 Management Triggers:

##### Tier 1-Fishing Mortality Management Triggers

- \* Option A1: the one-year status quo.
- \* Option B1: maintains the one-year status quo.
- \* Option C1: status quo option

##### Tier 2-Female SSB Management Triggers

- \* Option A2: 2-year deadline to implement a rebuilding plan
- \* Option B1: Status quo
- \* Option C1: Status quo

Tier 3-Recruitment Triggers

- \* Option A3: Below median of all values for three consecutive years
- \* Option B2: Reduce F to target in one year

Tier 4 Deferred Management Action

- \* Option A: No deferred action

4.2.2 Recreational Release Mortality

- \* Option B1: No – Effort Closures – State –Specific Two-Week Closures
- \* Option B2: No – Effort Closures – Spawning Area Closures
- \* Option C1: Yes – Additional Gear Restrictions – permit only non-lethal devices for removing fish
- \* Option C2: Yes - Additional Gear Restrictions –fish caught on any unapproved method must be returned to the water
- \* Option D1: Yes – Outreach and Education – States required to develop public education and outreach campaigns

4.4.1 Rebuilding Plan

- \* Option B: Assumption for Rebuilding – Use low recruitment regime assumption (although an average of the standard recruitment method and the low recruitment regime seems more appropriate to me)

4.4.2 Rebuilding Plan Framework

- \* Option B: Permit Board to take action in response to 2022 benchmark assessment without having to go through an amendment or public comment period

4.6.2 Management Program Equivalency

- \* Sub-Option B1a: Restriction – stock is at or below the biomass threshold
- \* Sub-Option B1c: Restriction – fishing mortality is at or above the fishing mortality threshold
- \* Sub-Option B2b: Applicability: Quota managed recreational fisheries
- \* Sub-Option C3: Precision Standards for MRIP Estimates – 30
- Sub-Option D3: CE Uncertainty for non-quota managed fisheries – 50%
- \* Sub-Option E2: Percent reduction at the state-specific level



**From:** [Marc Quenzer](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Public comment  
**Date:** Thursday, March 17, 2022 11:54:20 AM

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I would like to submit my comment and support whatever the Atlantic Saltwater Guides Association proposes.

I would also like to add that I support a two week season closure in areas where striped bass spawn. Tributaries of the Chesapeake, The Delaware river, the tributaries of the raritan bay and Hudson River. I would also want that to go for commercial fisherman in the Chesapeake. There is a viral video that is going around Instagram of large spawning size female bass netted in a Chesapeake bay tributary. This need to be addressed. Nothing should be interfering with the striped bass migration to there spawning ground.

Lastly I just want to see these fish come back to the leaves they were. Do what's right what need to be done to rebuild the stock.

Marcus Quenzer

**From:** [Ben Whalley](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7 Comment Letter - Ben Whalley  
**Date:** Wednesday, March 16, 2022 11:42:32 PM

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To the Advisors and Board members of the Atlantic States Marine Fisheries Commission:

I write this as an obsessed fly fishing angler, Maine striper guide and most importantly father to a young daughter. I am grateful for the opportunity to voice my comments on the proposed Amendment 7 to the ASMFC Atlantic Striped Bass Management Board. I spend hundreds of hours on the water chasing this beloved specie. I am situated on the northernmost fringe of their migration and over the past 5 years it continues to become more and more apparent that the migratory striper population is not healthy and needs some immediate measures to improve their odds of rebounding once again. The thought of my daughter, and someday grandkids not being able to enjoy these activities I am so passionate about is a sad pill to swallow. Protecting our striped bass stocks, safeguarding the recreational angling industry that relies on these fish, and ensuring that future generations of anglers can enjoy catching our coastal fishery should be of utmost importance to us all, I know it is for me. I wish to support the following options in the current Amendment 7 draft:

On 4.1 Management Triggers, we support:

Tier 1: Options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality

Tier 2: Options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold

Tier 3: Options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions

Tier 4: Option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, we support:

Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method

Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, we support:

Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. We recognize this option may require more restrictive management measures than option A, which we support

On 4.4.2 Rebuilding Plan Framework, we support:

Option B to allow the Board to take direct management actions as well as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50%

probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, “Management program equivalency (also known as “conservation equivalency” or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

We believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically, we support:

Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level

Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates

Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries

Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

Thank you for allowing us all the opportunity to comment on Amendment 7. I look forward to learning the outcome of the upcoming stock assessment and to reading the final version of the Amendment.

Ben Whalley

| [benwhalleyfishing.com](http://benwhalleyfishing.com) |

|@benwhalleyfishing|

**From:** [Louis Falsetta](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass For Public Comment  
**Date:** Wednesday, March 16, 2022 4:25:00 PM

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To the party it may concern,

My name is Louis A.Falsetta.

I am writing in regards to why the striped bass fisheries management is important to me. I was turned onto Striped Bass fishing several years ago and have unfortunately watched the slow decline in the amount of fish I catch every year.

So yes, it is very important to me that the Striped Bass Fishery be managed properly and intelligently.

Here is my list of preferred options;

**4.1 Management Triggers:**

*Tier 1-Fishing Mortality Management Triggers*

- \* Option A1
- \* Option B1
- \* Option C1

*Tier 2-Female SSB Management Triggers*

- \* Option A2
- \* Option B1
- \* Option C1

*Tier 3-Recruitment Triggers*

- \* Option A3
- \* Option B2

*Tier 4-Deferred Management Action*

- \* Option A

**4.2.2 Recreational Release Mortality**

- \* Option A
- \* Option B1: Not in favor
- \* Option B2: Not in favor
- \* Option C1
- \* Option C2
- \* Option D1

**4.4.1 Rebuilding Plan**

- \* Option B

#### **4.4.2 Rebuilding Plan Framework**

- \* Option B

#### **4.6.2 Management Program Equivalency**

- \* Sub-Option B1a
  - \* Sub-Option B1c
  - \* Sub-Option B2b
  - \* Sub-Option C3
  - \* Sub-Option D3
- \* Sub-Option E2.

My Home address is 93 Herman Avenue  
North Babylon, NY 11703

Best Regards,  
Louis Falsetta

**From:** [DM Rather](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Striped Bass Amendment 7  
**Date:** Wednesday, March 16, 2022 2:00:24 PM

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I have been a recreational Striper fisherman for decades, and have a deep stake in the restoration of our once-great Striped Bass fishery, which is in terrible shape. The time to act is now.

As to **Management Triggers**, the current triggers are workable. What is most important is that when the triggers and thresholds are met, *there is action*, not just studies, meetings, and delay.

Specifically regarding the **Fishing Mortality Timeline**, Sub-Option A1's one-year timeline is the best option. Let's not just kick the can down the road anymore.

Likewise, as to **Threshold Triggers**, Sub-Option B1 is preferable, as it does not add yet another year of delay.

As to **Target Triggers**, I support Sub-Option C1 for the same reasons.

To save this fishery, we need hard deadlines. A two year response time to implement a rebuilding plan is plenty, so on **SSB Triggers** I support Sub-Option A2. After all, Striped Bass were declared overfished in 2018 - *three years ago* - and no rebuilding plan has established. This is unacceptable.

The **SSB Threshold and Target Triggers** should remain the same, Sub-Options B1 and C1, and the timeframe should not exceed ten years.

We need to be much more responsive to changes in recruitment, and stop the over-exploitation of good recruitment classes. **Recruitment Trigger** Sub-Options A2 and B2 offer significant improvement.

There should not, at this point in our declining fishery, be **Deferred Management Action**, so I support Option A.

**Measures to Address Recreational Release Mortality:** Sub-Options C1 and C2 are practical and reasonable measures.

**Outreach and Education** can be more effective, and Sub-Option D2 promotes this. As to rebuilding, the **Recruitment Assumption for Rebuilding Calculation** must be honest, and low recruitment is our reality. So, Option B is the right choice.

**Rebuilding Plan Framework:** Option B gives the Board the best chance to quickly and effectively respond to the upcoming October '22 Stock Assessment.

There is simply no basis to continue to allow **Management Program Equivalency**, which has proven to be nothing but a tool for systematic evasion and abuse. CE's are a scam for states to make up their own "regulations" with no accountability whatsoever, and undermine all other efforts to rebuild our Striped Bass stocks and save our fisheries. CE's are the exceptions that swallow the rules, and should be disallowed. I strongly support Sub-Option B1-a, which comes closest to shutting down this awful practice.

Thank you for your consideration.

DJ Rather  
NY, NY

**From:** [rayvalk](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, March 16, 2022 8:36:54 AM

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Sent from my Galaxy

I hope as an avid striper fisherman my children are able to catch fish as I have for the last 40 years. Protecting these fish is very important but stopping fishermen from using a line and hook is not the solution to the population of the fish. In my opinion the solution is to give this fish sportfish status and stop trawlers from using Nets and catching entire schools of fish. One of those boats catches more fish in one day then me or my family have caught in an entire lifetime. There's no reason that fish markets can't sell hybrid striped bass farm-raised. I understand this will cause financial difficulties for a lot of companies but unfortunately if that's not the solution then the Anglers that fish for them and pay for fishing licenses to protect them we'll be the ones affected. Please help give these amazing fish sportfish status and stop the netting of striped bass. Thank you Raymond Valk

**From:** [Emilie Franke](#)  
**To:** [Comments](#)  
**Subject:** FW: Re: Thank you for attending Striped Bass Draft Amendment 7 Webinar Public Hearings  
**Date:** Wednesday, March 16, 2022 6:56:59 AM

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**From:** Paul Marzolla <[paulfishing87@gmail.com](mailto:paulfishing87@gmail.com)>

**Sent:** Tuesday, March 15, 2022 9:36 PM

**To:** G2W

**Subject:** [External] Re: Thank you for attending Striped Bass Draft Amendment 7 Webinar Public Hearings

First off, I would like to thank you for putting together last night's webinar and doing a great job at presenting Draft Amendment 7. I left the webinar with a better understanding of the topics and impacts at stake, along with how the process works at the state-level.

My only suggestion for the presentation would be to enforce greater moderation for "questions" at the end of each section. People were voicing their "comments" instead of topic-related questions at times which derailed the conversation.

I wish some of these for-hire captains would realize that if we don't take action now the repercussions will be far more severe for their business down the line; it's better to feel a little pain now than a lot in the future.

It is also my firm belief that comments supplied by for-hire captains, tackle shop owners, and other businesses who profit from the striped bass fishery should be taken with a grain of salt, even omitted. Their views are biased as they only see dollars. They aren't putting the striped bass fishery first, they aren't looking at this from an ethical standpoint, but rather their own self-interests.

If you truly want to help the striped bass fishery in NJ you will need to impose a 2-4 week closure, contingent that it includes the Raritan Bay and in the month of April. That is when and where the big Hudson breeder striped bass stage prior to migrating up river. It is when the fishery feels the most pressure from shore and boat anglers alike. When the striped bass are most prone to release mortality (and poaching) before they spawn, which has a direct impact on future stock.

Thank you for your time. I will be submitting a more detailed written comment in the upcoming days.

Kind regards,



Paul Marzolla

On Tue, Mar 15, 2022 at 8:01 PM Webinar Staff 1 <[customer@gotowebinar.com](mailto:customer@gotowebinar.com)> wrote:

We hope you enjoyed our webinar.

Please send your questions, comments and feedback to: [g2w@asmfc.org](mailto:g2w@asmfc.org).

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**From:** [G2W](#)  
**To:** [Comments](#)  
**Subject:** Fw: [External] Striped Bass Webinar  
**Date:** Wednesday, March 16, 2022 6:53:44 AM

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**From:** Tony <tlerr@comcast.net>  
**Sent:** Wednesday, March 16, 2022 12:23 AM  
**To:** G2W  
**Subject:** [External] Striped Bass Webinar

I did have one comment – I think the average angler needs more education on how to handle a fish to improve it's chances of survival after release. Too many times I see someone catch a striper out of the slot limit, either too small or too large, that will be released but first it's dragged up the beach for measuring(find the tape) and photos(find someone to take a picture). When the fish finally gets released it's covered in sand and has been out of the water for an extended period of time. Unhook and release ASAP is the way to go.

Thanks

Sent from [Mail](#) for Windows

**From:** [LOUIS LARUSSO](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped bass management  
**Date:** Tuesday, March 15, 2022 7:31:07 PM

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Hi Louis LaRusso

I have been fishing 50+ years. I remember the 80s no stripers (moratorium) don't want to see that again. Note: in all of my years never took home a striper over 35 inches they don't taste great I would say 95% of fish I caught are released.

Sent from my iPhone

**From:** [cnirome@optonline.net](mailto:cnirome@optonline.net)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, March 15, 2022 6:27:23 PM

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I hope you can do everything in your power to insure our kids have a full healthy stock of striped bass to fish. As we're all aware there's a lot of critically overfished areas around the world that we can't control.

Let's do our best to put the right management programs in place in the areas we can control. SB's need a deeper level of protection.

Thanks for your consideration.

P Bartley

**From:** [Chris Keen](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, March 15, 2022 3:32:45 PM

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Dear ASFMC - I am writing to let you know that I am in support of Conservation Equivalency for Striped Bass. Striped Bass were my first love when it came to Saltwater Fishing. Growing up in Pennsylvania we only had trout and LMB but we'd look forward to driving to New Jersey or Maryland to catch and release striped bass every year. I eventually moved to Newport, Rhode Island mostly because of my love for chasing stripers in the surf. In the last 10 years, many of our trips we've gotten completely skunked. If we aren't skunked, we will maybe get one or two small fish if we are lucky even after putting hours in at multiple "proven" spots.

Please help out our resource by enacting policy to ensure this resource will still be here for my own children and others for years to come.

Chris Keen  
Saltwater Fishing Enthusiast  
Newport, RI

**From:** [Eric Bosley](#)  
**To:** [Comments; stripercomments@gmail.com](#)  
**Subject:** [External] Ammendment 7  
**Date:** Tuesday, March 15, 2022 11:36:43 AM

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Have you considered artificial lures only?

This would drastically reduce the mortality rate of fish released.

It would positively impact the endangered American Eel, and help bolster the SB forage species of menhaden, herring, clams, crabs, etc, etc....

--

*Eric Bosley*

*Bozco Construction, Inc.*

*(914) - 419 - 5960*

[ericbosley@gmail.com](mailto:ericbosley@gmail.com)

**From:** [kristopher magnotti](#)  
**To:** [Comments](#)  
**Subject:** [External] Addendum 7  
**Date:** Tuesday, March 15, 2022 10:27:29 AM

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Hello to the board members of the ASMFC,

I'm writing this in hopes my words do not fall on deaf ears. Im a Long Island resident living in Seaford and have had the privilege of enjoying the fishery from Manhattan to Montauk for the last 15 years. As a member of one of the oldest surfcasting clubs with conservation being a pillar in our constitution I am well informed on the issues at hand. With that said I have seen nothing but a stark contrast from yesteryear to the current status of our striped bass fishery... this fishery has been in an obvious downward trend for several years and NOW is the time to take the appropriate measures to ensure these fish have a future along the beloved striper coast. Please for the sake of the younger generations, including my 6 year old son, take action now as a delay will only further lead to the decline of this great resource. It's now your chance as ambassadors to the remaining stock to put the fish first ahead of the commercial interest, recreational charter boats, and those with monetary investments. Here are my chosen options for Addendum 7 thank you for your time

Sincerely

Kristopher Magnotti

#### **4.1 Management Triggers:**

##### *Tier 1-Fishing Mortality Management Triggers*

- \* Option A1
- \* Option B1
- \* Option C1

##### *Tier 2-Female SSB Management Triggers*

- \* Option A2
- \* Option B1
- \* Option C1

##### *Tier 3-Recruitment Triggers*

- \* Option A3
- \* Option B2

##### *Tier 4-Deferred Management Action*

- \* Option A

#### **4.2.2 Recreational Release Mortality**

- \* Option A
- \* Option B1: Not in favor
- \* Option B2: Not in favor
- \* Option C1
- \* Option C2
- \* Option D1

#### **4.4.1 Rebuilding Plan**

- \* Option B

#### **4.4.2 Rebuilding Plan Framework**

- \* Option B

#### **4.6.2 Management Program Equivalency**

- \* Sub-Option B1a
- \* Sub-Option B1c
- \* Sub-Option B2b
- \* Sub-Option C3
- \* Sub-Option D3
- \* Sub-Option E2

Sent from my iPhone



**From:** [ROBERT STOSCH](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment 7  
**Date:** Tuesday, March 15, 2022 8:39:54 AM

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Good morning. My name is Robert Stosch I live at 50 Brookside Ave. in North Babylon New York and have been a surf fisherman and member of High Hill striper club for the last 35 years and I am emailing you to acknowledge your efforts and also to inform you that I support both tier 1 and tier 2 options for stripe bass management. Thank you for your attention to such a volatile fishery and your conservation efforts.  
Regards, Robert Stosch

Sent from my iPad

**From:** [Michael Adams](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Striped Bass Amendment 7 Comments  
**Date:** Tuesday, March 15, 2022 8:30:53 AM

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To whom it may concern,

I would like to make the following comments regarding the 2022 striped bass amendment 7 from the perspective of a Connecticut recreational striped bass angler.

\*\*\*\*In addition to my comments below I would like to state that I support full winter closure for any striped bass fishing up and down the East Coast. \*\*\*\*

Mike Adams  
203 807 1700  
168 Cedarwood Rd  
Stamford, CT 06903

### **Tier 1: Fishing Mortality (F) triggers**

#### **Option A: Timeline to Reduce F to the Target**

**I Support Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year.

**Rationale:** By reducing fishing mortality to the target within one year, we would be reducing the number of fish removed from the system until that rate is at or below the target.

#### **Option B: F Threshold Triggers**

**I Support Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

**Rationale:** Much like sub-option A, there are only two options for the threshold trigger. B2 added an additional year just like A2 would do for the reducing F to target trigger. On paper, both sub-options A2 and B2 should state a minimum of two years. If the first year for either sub-option is the terminal year of a stock assessment, it could be longer than two years. In fact, it might be 3 or 4 years once the data comes in. For reference, the data used in the stock assessment currently used for decision-making has a terminal year of 2017.

#### **Option C: F Target Triggers**

**I Support Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

**Rationale:** Option C should stay status quo for two reasons. First, to keep in line with the previous two choices in Options A and B. Second, this option denotes a relationship between F and the status of the SSB.

## **Tier 2: SSB Triggers**

### **Option A: Deadline to Implement a Rebuilding Plan**

**I Support Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

**Rationale:** A two-year response timeline lines up with the requirements for fish managed by the regional councils that operate under the requirements of the Magnuson-Stevens Act. The closer we can get to federal management; the better off striped bass will be in the long run.

This is a very important facet of Amendment 7 because striped bass were declared overfished in 2018—nearly three years ago—and no rebuilding plan has been established. If this option is accepted, we can avoid this occurring in the future.

### **Option B: SSB Threshold Trigger**

**I Support Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

**Rationale:** If the stock becomes overfished, we need to address it as quickly as possible.

### **Option C: SSB Target Trigger**

**I Support Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

**Rationale:** Controlling fishing mortality is the number one tool to ensure stability in the stock. When the SSB declines, we must respond as quickly as possible.

## **Tier 3: Recruitment Triggers**

### **Option A: Recruitment Trigger Definition**

**I Support Sub-option A2:** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA) shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

**Rationale:** This trigger needs to be updated. It was never tripped for the coastal stock even though we have experienced some very poor recruitment. It has been tripped once for the North Carolina stock since 2003. That means it is not really a trigger. When you do a retroactive analysis of the performance of A2, it would have been tripped three times since 2003. The other sub-option, A3, would have tripped six times since 2003. That may be too sensitive for management. Meaning that if a trigger is tripped too often it can be easily ignored. A2 seems like the best option. It will show us when recruitment is a concern while not being overly cautious and burdensome to striped bass management.

### **Option B: Management Response to Recruitment Trigger**

**I Support Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated

using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

**Rationale:** We need to be responsive to recruitment. Lowering F in response to periods of low recruitment is the only way to ensure a stable striped bass population. We have a history of exploiting good year classes and not responding to poor ones. This adjustment to the trigger will make the board more responsive to what science is telling us.

#### **Tier 4: Deferred Management Action**

**I Support Option A (status quo):** No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

**Rationale:** We cannot delay management actions any longer. Status quo ensures that lengthy delays won't occur if this trigger is tripped.

#### **4.2.2 Measures to Address Recreational Release Mortality**

I support full winter closure for any striped bass fishing up and down the eastern seaboard

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Sent from Gmail Mobile

**From:** [tom tupper](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, March 15, 2022 8:08:03 AM

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I have to admit that I don't understand much of what I have read in the specific amendment in question. What I do know, based on what I have read and what little I understand, is that ever since the new slot limits were instituted, I have not landed a legal fish, despite catching 50 - 100 / tide. I feel terrible that I may be responsible for the mortality of 4 - 9 fish every time I step into the outgoing tide. Why can fisherman in the Chesapeake keep an 18"er and I have to hope for a 28"er. If were allowed to keep a fish in the former slot (20-26"), I would leave the river's edge in the same fashion that I did when the black duck limit was one / day. The joy of being in the outdoors and the small reward of a single beautiful duck were sufficient. Next day, same routine, same fulfillment. Now, instead, I step into the outgoing tide, doubting I will ever catch a keeper, but am committed to fishing the entire tide, just in case. Before, I would have a keeper within the hour, almost every trip, and I would stop fishing immediately on that given day. I only live 200 yards from a tidal river. If no luck within the first hour, I would stop until the next outgoing tide. By my simple math, and your statistics, I have been responsible for 100s of fish deaths since the 28" slot was instituted. Sad. Respectfully, an aging, disgruntled fly fisher

Sent from my iPad

**From:** [dennis@kooney.net](mailto:dennis@kooney.net)  
**To:** [Comments](#)  
**Subject:** [External] Subject: Draft Amendment 7  
**Date:** Monday, March 14, 2022 8:46:23 PM

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The ASMFC amendment is premature and proposed changes affecting the Hudson River fishery should be postponed until further studies can determine the impact of:

- Recent slot limit restrictions designed to reduce spawning stock mortality
- New regulation requiring the use of circle hooks to reduce overall mortality rates
- The impact of Indian Point nuclear plant closing.
  - It has been estimated that billions of fish, fish eggs and fish larvae were destroyed each year by the plants cooling system. The closure of the facility should see an immediate improvement in the Hudson River recruitment stock.
- Economic impact of the amendment to Hudson Valley stakeholders needs to be explored further

Moving forward a more holistic approach to striped bass fishery management needs to be considered including but not limited to:

- Reduction of commercial striped bass quotas along the Atlantic coast
- Reduction to commercial menhaden and herring quotas along the Atlantic coast, a main food source for striped bass
- Consider environmental improvements to spawning environments
  - Removal of tributary dams
  - Improvements to sewage management and storm water runoff facilities to reduce summer hypoxic conditions contributing to frequent massive fish kills in the estuary.
- Consider the impact on striped bass and other specie migrations from planned deployment of high voltage utility lines along the Hudson River.
- Reestablish striped bass hatcheries and stocking programs

Sincerely,  
Dennis Kooney  
Croton Yacht Club, Director

**From:** [Gary Eisinger](#)  
**To:** [Comments](#)  
**Subject:** [External] Subject: Draft Amendment 7  
**Date:** Monday, March 14, 2022 5:36:49 PM

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The ASMFC amendment is premature and proposed changes affecting the Hudson River fishery should be postponed until further studies can determine the impact of:

- Recent slot limit restrictions designed to reduce spawning stock mortality
- New regulation requiring the use of circle hooks to reduce overall mortality rates
- The impact of Indian Point nuclear plant closing.
  - It has been estimated that billions of fish, fish eggs and fish larvae were destroyed each year by the plants cooling system. The closure of the facility should see an immediate improvement in the Hudson River recruitment stock.
- Economic impact of the amendment to Hudson Valley stakeholders needs to be explored further

Moving forward a more holistic approach to striped bass fishery management needs to be considered including but not limited to:

- Reduction of commercial striped bass quotas along the Atlantic coast
- Reduction to commercial menhaden and herring quotas along the Atlantic coast, a main food source for striped bass
- Consider environmental improvements to spawning environments
  - Removal of tributary dams
  - Improvements to sewage management and storm water runoff facilities to reduce summer hypoxic conditions contributing to frequent massive fish kills in the estuary.
- Consider the impact on striped bass and other specie migrations from planned deployment of high voltage utility lines along the Hudson River.

Sincerely,  
Gary Eisinger  
Croton Yacht Club, Rear Commodore

**From:** [Dale Bradshaw](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass  
**Date:** Monday, March 14, 2022 4:57:21 PM

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I think Striped Bass fisherman should be made aware of the removal of Treble hooks from lure's and replacing them with single inline hooks when trolling or casting from shore. Using single in line hooks on lures will greatly lower the mortality rate of fish when caught and released. Inline circle hooks should also be a requirement when bait fishing for striped bass.

Dale B

Sent from [Mail](#) for Windows



**From:** [Herb Fitzer](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Monday, March 14, 2022 3:22:52 PM

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Dear Emilie Franke,

Hello,

Speaking as a long-time sport fishing enthusiast/angler, I can only offer up what I have seen works and what does not work, as you probably already know. Commercial netting, probably the most efficient it's ever been with motor/mechanical practices now in place. The nets miss nothing, everything that's netted dies, period. The practice of beach haul-seining was stopped years ago and it took years for the striped bass to come back, somewhat. However, the practice of mechanical netting still is in practice offshore to leave very little afterwards for anyone. Other states have banned mechanical netting. It is not the sport fisherman depleting the striped bass population. Limiting daily harvests for sport fishermen does have its merit but does not hold a single candle to commercial netting. Striped bass are seasonal, they swim past our shores twice yearly to their destination grounds, and we are lucky enough to harvest this gamefish with hook and line. Commercial netting needs to stop period. Sport fishermen are down to one fish/within a slot size per day, are you kidding me? Not to mention the circle hook thing. What's next? No possession? Stop commercial netting now.

Sincerely yours,

Herbert W. Fitzer, Jr.

**From:** [Carson Coyle](#)  
**To:** [Comments](#)  
**Cc:** [WSBC Westport](#)  
**Subject:** [External] Comments on Draft Amendment 7, Sections 4.6.2 and 4.4.2  
**Date:** Monday, March 14, 2022 2:27:08 PM

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Hello,

I respectfully ask that you focus your efforts on creating an abundance of Striped Bass stocks, it will be good for the environment, it will get more people outdoors, and it will dramatically boost our economy along the eastern seaboard.

I have never commented before, but I feel it is crucial that I address Section 4.6.2, "Management Program Equivalency." Please do NOT allow individual states the option of creating their own regulations that differ from those of the Interstate Fishery Management Plan (FMP). We need to manage the fishery as a whole and cannot allow states to have different striped bass size requirements, regulations, and separate quotas.

Additionally, regarding 4.4.2, I would urge you to encourage states to educate the public on best handling and catch and release practices for striped bass through public education and outreach campaigns. It is critical to the success of our breeding stock.

Thank you for your attention and thank you for your dedication to our marine resources.

Carson Coyle  
Norwalk, CT

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**From:** [Richard Reich](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Monday, March 14, 2022 9:06:03 AM

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Coming up on sixty five years old I've lived through the moratorium on striped bass. Then we started at thirty six inch limit and saw the bass come back strong over the years. Well,we rode it all the way back down to where the striped bass are in trouble. Please rebuilt the stock so the next generation can experience what I had as a kid.

Thank you, be safe.

Richard Reich  
Gansett Custom Tackle  
401 742-2020

**From:** [Darryl Forrester](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft amendment 7  
**Date:** Monday, March 14, 2022 8:55:44 AM

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To the committee:

Please add my voice to those who are in favor of amendment 7. It is sad that we have to propose legislation to protect this spectacular resource! It probably should have been done years ago, but when money is in the mix, the stakes get higher, and it's easy for the commercial interests to overwhelm the recreational interests, though there are many monetary benefits to preservation in the long run. Once the fish are depleted, the money guys will move on to other areas, without a thought of the mayhem and devastation they have caused.

Please look to the future and pass the amendment.

Darryl Forrester  
Westerly, RI

**From:** [Mac Huelster](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Sunday, March 13, 2022 11:32:57 PM

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Hello.

I'd like to voice my support for amendment 7. I am a catch and release fly angler from Brooklyn NY. I primarily fish for striped bass in Jamaica bay. We need to do all we can to protect these fish for generations to come.

I echo the position of Masters of the Fly which is copied below.

Thank you.

Mac Huelster  
Greenpoint BK

To the Advisors and Board members of the Atlantic States Marine Fisheries Commission:

As an organization serving the broad community of conservation-minded recreational saltwater anglers residing in and spending thousands of hours annually fishing the coastal waters along our Atlantic states, we welcome the opportunity for public commentary on the proposed Amendment 7 to the ASMFC Atlantic Striped Bass Management Plan. Protecting our striped bass stocks, safeguarding the recreational angling industry that relies on these fish, and ensuring that future generations of anglers can enjoy catching our coastal fishery are paramount to us. With this said, we wish to support the following options in the current Amendment 7 draft:

On 4.1 Management Triggers, we support:

Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality

Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold

Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions

Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, we support:

Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method

Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, we support:

Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. We recognize this option may require more restrictive management measures than option A, which we support

On 4.4.2 Rebuilding Plan Framework, we support:

Option B to allow the Board to take direct management actions as well as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, “Management program equivalency (also known as “conservation equivalency” or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

We believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically, we support:

Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level

Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates

Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries

Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

Thank you for providing the opportunity to comment on Amendment 7. We look forward to learning the outcome of the upcoming stock assessment and to reading the final version of the Amendment.

Masters of the Fly

March 6, 2022

East Hampton, New York

**From:** [Timothy O'Connor](#)  
**To:** [Comments](#)  
**Subject:** [External] KAF Comments on Draft Amendment 7  
**Date:** Sunday, March 13, 2022 6:20:02 PM

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Dear Ms. Franke,

As a striped bass angler, I support balancing precautionary management with regulatory stability and reasonable access to the fishery. To achieve that, I support the following options. I would recommend a moratorium having recreational anglers keep/kill striped bass for the foreseeable future and I would significantly reduce the commercial harvest limit until the fish have fully recovered. The population is down significantly compared to the 90's and first part of this century. FYI - I live on the water and fish at least twice a week for bass and blues and I have been fishing for 40 years.

Management Triggers:

Fishing Mortality Triggers:

Timeline to Reduce F to the Target, I support Sub-option A1 (status quo) 1 year.

F Threshold Trigger, I support Sub-option B1 (status quo) If F exceeds the threshold in a single year, action must occur to reduce F to the target within timeframe selected under sub-option A (supported A1 above).

F Target Trigger, Support Sub-option C1 (status quo) if F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, must reduce F to a level that is at or below the target within the timeframe selected under sub-option A (supported A1 above).

Spawning Stock Biomass Triggers

Deadline to Implement a Rebuilding Plan, I Sub-Option A2: Two-Year Deadline

SSB Threshold Trigger, I support Sub-option B1 (status quo) Rebuild when SSB in a single year falls below the threshold.

SSB Target Triggers, I support Sub-option C3. No management trigger related to SSB target because F target trigger also has an SSB target component and managers directly control F.

Recruitment Triggers

Recruitment Trigger Definition, I support Sub-option A2: Moderate Sensitivity Recruitment Trigger.

Management Response to Recruitment Trigger, I support a variation of Sub-option B2. The Board use an interim F target calculated using the low recruitment assumption and then during the next stock assessment it evaluates F against the new interim F target and simultaneously evaluates all the other management triggers to determine if action is needed.

Deferred Management Action, I support Option A. No deferred management action. Stock assessments following a management change should be scheduled to enable evaluation of two fishing years under the new management measures providing an opportunity for the population to react to the corrective management action while creating management stability for at least two years.

Measures to Address Recreational Release Mortality

Seasonal closures, I support Sub-options B2 Spawning Area Closures.

Gear restrictions, I support Sub-options C1 and C2.

Outreach and Education, I support Sub-option D1. States are required to promote best striped bass handling and release practices by developing campaigns.

Recruitment Assumption for Rebuilding Calculation, I support Option B. Use a low recruitment assumption for the 2022 stock assessment.

Rebuilding Plan Framework, I support Option B. Enable ASMFC to respond quickly through Board action.

Management Program Equivalency, I support Sub-options B1-A and B1-C, C3, and D1.

Thank you for the opportunity for allowing me to share my thoughts on this important issue.

Sincerely,

Timothy O'Connor  
8 Seaview Ave  
Hull, MA 02045  
tjoc@me.com



**From:** [neil.rothkopf](mailto:neil.rothkopf)  
**To:** [Comments](#); [Maureen Davidson](#); [ECHI2@CORNELL.EDU](mailto:ECHI2@CORNELL.EDU); [JAMES.GILMORE@DEC.GOV](mailto:JAMES.GILMORE@DEC.GOV); [Sen. TODD KAMINSKY](#); [neil.rothkopf](mailto:neil.rothkopf)  
**Subject:** [External] Draft Amendment 7  
**Date:** Sunday, March 13, 2022 5:14:59 PM

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My name is Neil Rothkopf D.D.S., and I am a retired dentist who has been fishing the shores of Long Island for over 60 years. I am a member of the Traditional Surfcasters Fishing Club, and am the treasurer of the New York Coalition for Recreational Fishing.

Over the years I have observed the size and quantity of striped bass fluctuate. I believe that present management techniques and decision-making triggers are not being effective in preventing the decline of the bass population.

Existing rules do not allow timely responses to slow the bass population decline. The increasing of female spawning biomass is a vital measure and the actions of the past have not been successful. A revision of the techniques and triggers used by the ASMFC to act on conservation matters must be enacted.

I support the following options:

1. Tier 1 management triggers, I support options A1, B1, C1
2. Tier 2 female spawning biomass, I support options A2, B1, C1
3. Tier 3 recruitment triggers, I support options, A2, B1, C1
4. Tier 4 I support option A
5. 4.2.2: recreational release mortality, I oppose options B1, and B2. I support options A, C1, C2, and D1
6. 4.4.1: rebuilding plan, I support option B
7. 4.4.2: plan framework, I support option B
8. 4.6.2: management program equivalency:  
I support sub-options; B1a ,B1c, B2b, C3, D3, and E2

Please fix the management regulations so that our grandchildren can enjoy fishing the Long Island shores as much as we did.

Sincerely,

Neil Rothkopf D.D.S.  
25 Adelhaide Lane  
East Islip, N.Y. 11730

**From:** [James Bowling](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Sunday, March 13, 2022 5:03:38 PM

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Summary list of options : my preferences

Tier 1

A1,B2,C3

Tier 2

A2,B1,C2

Tier3

A1,B1

Tier4

Option f

Recreational release mortality

Option a

Yes

Option B1

B1-a

Option C

C1

Option D

D1

Rebuilding plan

Option A

Process of Responding to. 2022 assessment

Option a

Conservation Equivalency

Option A

This is most important,so that each state can have a best fit for there area while conserving the resources

Thanks for allowing my input

James Bowling

Sent from my iPad

**From:** [Timothy Reichheld](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7 Comments  
**Date:** Sunday, March 13, 2022 12:30:22 PM

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Dear ASMFC Committee Members,

Please accept these comments on the draft of Amendment 7. These fish are very important, not only to the economy of the Northeast, but also are an integral part of the coastwide culture. Please do all you can to protect these fish and this fishery from further decline. We are at a critical area. The power is in your hands.

#### **4.1 Management Triggers**

Management triggers need to be taken seriously with prompt action after they are activated. The status quo should be maintained and triggers should be addressed in one year. A multi-year activation is harmful to the conservation of this fishery and is unacceptable. Do not delay or defer proper management any longer.

I am in support of

Tier 1: A1, B1, C1

Tier 2: A2, B1, C1

Tier 3: A2, B2

Tier 4: A

#### **4.2.2 Measures to Address Recreational Release Mortality**

I am in favor of Tier 1 B2-a. No harvest in spawning areas for recreational anglers during spawning. It should also be noted that this should be the same for commercial anglers as well. We should all be working to protect these fish during their most vulnerable time.

I also support C1 and C2 gear restrictions and D2 angler education.

#### **4.4.1 Recruitment**

I support option B using the low recruitment method to better accurately account for striped bass levels.

#### **4.4.2 Rebuilding**

I am in favor of option B to allow the board to act quickly to protect this fishery.

#### **4.6.2 Conservation Equivalency**

Please do not allow states to abuse CE

Option B:

CE should not be allowed until the stock is above threshold levels. For this reason I support B1-a

Option C:

30% precision is in line with federal guidance and would only make sense to be used. I am in support of C3

Option D:

I support D2

Option E:

I support E2

Thank you for taking the time to review my comments. I am hopeful with proper leadership this fishery can rebound and be great once again for future anglers.

Sincerely,

Dr. Timothy Reichheld

**From:** [David Kuperschmid](#)  
**To:** [Comments](#)  
**Subject:** [External] KAF Comments on Draft Amendment 7  
**Date:** Sunday, March 13, 2022 11:30:02 AM

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Dear Ms. Franke,

As a striped bass angler, I support the options listed below. But I want to add that any fisheries management plan is just reshuffling the deck if there's no meaningful enforcement of the size and possession regs that support a selected plan.

Management Triggers:

Fishing Mortality Triggers:

Timeline to Reduce F to the Target, I support Sub-option A1 (status quo) 1 year.

F Threshold Trigger, I support Sub-option B1 (status quo) If F exceeds the threshold in a single year, action must occur to reduce F to the target within timeframe selected under sub-option A (supported A1 above).

F Target Trigger, Support Sub-option C1 (status quo) if F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, must reduce F to a level that is at or below the target within the timeframe selected under sub-option A (supported A1 above).

Spawning Stock Biomass Triggers

Deadline to Implement a Rebuilding Plan, I Sub-Option A2: Two-Year Deadline

SSB Threshold Trigger, I support Sub-option B1 (status quo) Rebuild when SSB in a single year falls below the threshold.

SSB Target Triggers, I support Sub-option C3. No management trigger related to SSB target because F target trigger also has an SSB target component and managers directly control F.

Recruitment Triggers

Recruitment Trigger Definition, I support Sub-option A2: Moderate Sensitivity Recruitment Trigger.

Management Response to Recruitment Trigger, I support a variation of Sub-option B2. The Board use an interim F target calculated using the low recruitment assumption and then during the next stock assessment it evaluates F against the new interim F target and simultaneously evaluates all the other management triggers to determine if action is needed.

Deferred Management Action, I support Option A. No deferred management action. Stock assessments following a management change should be scheduled to enable evaluation of two fishing years under the new management measures providing an opportunity for the population to react to the corrective management action while creating management stability for at least two years.

Measures to Address Recreational Release Mortality

Seasonal closures, I support Sub-options B2 Spawning Area Closures.

Gear restrictions, I support Sub-options C1 and C2.

Outreach and Education, I support Sub-option D1. States are required to promote best striped bass handling and release practices by developing campaigns.

Recruitment Assumption for Rebuilding Calculation, I support Option B. Use a low recruitment assumption for the 2022 stock assessment.

Rebuilding Plan Framework, I support Option B. Enable ASMFC to respond quickly through Board action.

Management Program Equivalency, I support Sub-options B1-A and B1-C, C3, and D1.

Thank you for the opportunity for allowing me to share my thoughts on this important issue.

Sincerely,

David Kuperschmid  
23 Grape Arbor Ln  
East Hampton, NY 11937  
dckgeneral@gmail.com

**From:** [Sea-Money Fishing](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7, my Public Opinion  
**Date:** Saturday, March 12, 2022 5:27:50 PM

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Thank you for allowing the public voice to be heard. I do believe the striped bass need our help as I have seen the falling out of the population over the past 10 years. I mostly fish MD, NJ and RI/Mass. One of my main concerns is that virginia commercial fishery in the lower chesapeake is OPEN during the pre spawn time. The Breeders enter the bay starting in the late fall and have to navigate their way around the gillnets, seine nets, pound nets, and hook and line commercial anglers, whom never reach their quota, thus being able to keep all the 40-50" class of fish they can catch (until mid march of course). I believe the commercial size should be lowered to that of marylands, under 36", and fish over size must be released IMMEDIATELY, in both VA AND MD. I witnessed 40-50" bass in a purse seine for a day and a half in maryland this february. while the crew worked around the bass the whole time, this is unacceptable as at least a couple of the bass were belly up by the end of it, and who knows how many actually were killed, or if they were destined for a VA market, but it should be law those fish be immediately released. Eliminating the sale of that size fish would also close the door on any maryland waterman who may be poaching their fish by giving them to their friends in VA. In fact it would be far more productive to ban all commercial fishing in every state, at this point the recreational dollars spent far outweigh whatever the commercials are profiting. The chesapeake has big problems with water quality which I do believe accounts for a lower YOY count. Knowing Water quality will take its toll on juvenile fish, it would make sense to ban the killing of breeders as they enter the bay. Keeping omega out of the bay is also of vital importance as there needs to be an abundance of juvenile menhaden for these young fish to feed upon. The raritan/hudson stock somehow seems to be in good shape as the fishing in the raritan has been getting better and better for the past few years. I am in full support of making striped bass a gamefish and banning all commercial fishing.

**I support Sub-option A1.** Reduce F to a level that is at or below the target within one year.

-Delaying action will get us nowhere but further from our goal of strengthening this fishery. Reducing the number of fish being removed from the fishery will only benefit the fishery as a whole.

### **Option B: F Threshold Triggers**

**I support Sub-option B1.** If F exceeds the F threshold the SBMP must be adjusted to reduce F to the desired level within the time frame in option A1.

-delaying action will only continue to hurt the fishery.

### **Option C: F Target Triggers**

**I support Sub-option C1.** If F exceeds the F target for two consecutive years and the spawning female SB fall below the target in either of those years the SBMP must be adjusted to reduce F to a level at or below the threshold within the option A timeframe.

-This stays in line with the previous options and denotes a relation between F and Spawning Female Striped Bass.

## **Tier 2: SSB Triggers**

### **Option A: Implementing Rebuilding Plan**

**I Support Sub-option A2.** The shorter the deadline for implementing a SSB rebuilding plan the better.

-Obviously this must be within reason in order to be realistic and be effective. Implementing a rebuilding plan within 2 years of a trigger seems to do that. Again the sooner the better. **Striped bass were declared overfished in 2018. There has still been no rebuilding plan implemented or established. This is a problem. This option would prevent this happening in the future.**

### **Option B: SSB Threshold Trigger**

**I support Sub-option B1.** The Striped Bass Management Program must be adjusted to rebuild the biomass within an established time frame. If the stock becomes over fished, which many feel it currently is. It needs to be addressed as soon as possible. Cannot exceed 10 years. Much sooner would be preferred and I could argue that sooner is necessary.

### **Option C: SSB Target Trigger**

**I support Sub-option C1.** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years]. **Sooner is better.**

## **Tier 3: Recruitment Triggers**



## **Option A: Recruitment trigger definition**

**I support Sub-option A3.** The trigger needs to be updated immediately. It has not been tripped for the coastal stock which is a major issue. It has been tripped 1 time since 2003 for NC which is a clear and definitive example of why it must be updated. My **second choice** would be **Option A2**

## **Option B: Management Response to trigger**

**I support Sub-option B2.** We must be responsive to recruitment triggers. We must listen to the science and stop exploiting strong year classes and ignoring the poor ones.

## **Tier 4: Deferred Management Action**

**I support Option A.** There should be **no** deferred management action **without exception.**

### **4.2.2 Addressing Recreational Release Mortality**

**I support Sub-option C1.**

**I support Sub-option C2.** There is **no** reliable data to quantify the effects any proposed C&R targeting closures would have. Especially while leaving the nets in spawning/staging areas.

## **Option D: Outreach and Education**

**I support Sub-option D2.**

### **4.4 Rebuilding Plan:**

We are in a very bad position with the striped bass stock. When the latest stock assessment

was accepted in 2019, we curbed the F rate through Addendum VI. We did not address rebuilding. That means we have less time to get the job done. The poor recruitment in the Chesapeake is making this situation far worse. We don't have good year classes to rely upon.

If you go back in time to 2012, many concerned anglers were ringing the alarm bells about the stock. We knew from the numbers that striped bass SSB would be overfished by 2017. But the numbers for the 2011 year-class showed it was the fourth-best on record. Rather than take a greater-than-30% reduction in harvest, we bet on the 2011 year-class. The Chesapeake, meanwhile, only took a 20.5% reduction. The 2011s were going to save the day. Unfortunately, Maryland decimated the 2011s and the cohort did not recruit to the coastal migratory stock in the numbers we all wanted.

Fast forward to today and it is 2022, three years after a rebuilding plan should have been in place, and we are watching a stock in freefall with no year classes to replace them. What does rebuilding look like now?

#### **4.4.1**

**I support Option B.**

#### **4.4.2**

**I support Option B.**

#### **4.6.2**

**I support Sub-option B1.** Restrict the use of CE

**Option C:**

**I support Sub-option C3.**

**Option D:**

**I support Sub-option D2.**

**Option E:**

**I support Sub-option E2.**

**From:** [George Steller](#)  
**To:** [Comments](#)  
**Cc:** [captgeo1@aol.com](mailto:captgeo1@aol.com)  
**Subject:** [External] stripebass  
**Date:** Saturday, March 12, 2022 4:49:19 PM

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if 6 passenger charter boat catches only stripers over 38 inches and no stripers under 38 inch to 28 inches we should be allowed to keep one over 38 inches for paying passengers to share 1 fish so they get to go home with some food for table thanks captgeo1@aol.com

**From:** [Joe Tag](#)  
**To:** [Comments](#)  
**Subject:** [External] Please let me take 1 or two fish each day about 20 to 28 inches. I believe the existing laws are causing more fish to be killed than if I took two fish and went home  
**Date:** Saturday, March 12, 2022 11:33:07 AM

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Sent from my iPhone

**From:** [Tyler Clark](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Saturday, March 12, 2022 3:50:49 AM

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ASMFC,

As an avid angler for striped bass in the state of New Jersey, I feel that this iconic species must be protected with far stricter regulations than what we have now. The steady decline of their population over the last fifteen years is reason for concern and it is important we act before it's too late. In my home waters, I'm asking for a catch and release fishery in Raritan Bay in the spring during the peak of the spawn (April-May). I am thankful for the slot limit along with the use of circle hooks for bait, however I think the use of treble hooks should also be addressed. Why should hooks that cause so much damage to a fish be used by anglers who can end up catching 30 fish in a day where only one may be kept. All over the country there are rules protecting game fish from being targeted with treble hooks so why can't we take the same measures for striped bass? Single hooks are more than adequate and will ensure a larger percent of fish caught can be released unharmed. Lastly, I believe the slot limit should be slightly altered to protect the 2015 year class that is moving into slot. Moving the minimum size to 30" could provide an additional year or two of protection for this spawning class. I feel there are some simple steps that can be taken such as those noted above which would have lasting positive impacts on the fishery. This game fish contributes millions of dollars to the eastern seaboard from its recreational sector and deserves to be managed for abundance for future generations. Thank you for this comment period and I hope you take action to further protect Striped Bass before it's too late.

-Tyler Clark

Sent from my iPhone

**From:** [Brandon Angell](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] amendment 7 comments  
**Date:** Friday, March 11, 2022 8:52:53 PM

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Members of the board of ASMFC,

I personally believe that striped bass stock should be managed for abundance both for the benefit and enjoyment of the many recreational anglers throughout the northeast and for the economic benefit to coastal areas these fisherman flock to each year to pursue these fish. I believe striped bass are a valuable resource to the region and that should be reflected in management practices. With that said I'd like to express my support for some areas of the amendment 7 draft.

4.1 Management Triggers:

I support options A1, B1, and C1

4.2.2 Measures to Address Recreational Release Mortality:

I support options C1, C2, and D2

4.4.1 Recruitment Assumptions for Rebuilding Calculation:

I support option B

4.4.2 Rebuilding Plan Framework:

I support option B

4.6.2 Management Program Equivalency:

I support restricting the use of conservation equivalency based on the status of the fish stock for this reason I support options B1-a, C3, D2, and E2

Thank you for the opportunity to comment and participate in this process and for taking the time to consider all the feedback I'm sure you've received on this issue that I know so many feel strongly about.

Brandon Angell

Brunswick, Maine

**From:** [Jt Toomey](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, March 11, 2022 5:34:50 PM

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The ASMFC's blatant disregard to recognize recreational anglers as well as the saltwater guides who make a living off of the catch and release striped bass fishery is disappointing. I know New Jersey isn't perfect but we do not even have a commercial fishery for striped bass in state waters. The fact that they want to put the bulk of the blame on the depletion of the species on recreational anglers while gill nets are allowed to be out during the main spring spawn down in the Chesapeake is mind boggling. Not to mention the disgusting video of that shad net full of above slot size stripers that were stuck rubbing against each other for over a day. But the commission is going to look us recreational anglers in the face and tell us we are the problem. Have them start to have Maryland DNR hold the commercial guys accountable and get the damn nets out of the water during spawning season. It really doesn't seem that complicated. And absolutely no on a recreational moratorium in the middle of prime season when the local charters are taking clients out. The charter captains are just as valuable to the local economies as the commercial fishermen , the only difference is they aren't depleting the resource so nobody else can benefit from it.

-JT



**From:** [Todd Forrest](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [Justin Davis](#); [William.a.hyatt@snet.net](mailto:William.a.hyatt@snet.net); [Sen. Craig A. Miner](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, March 11, 2022 5:10:24 PM

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Dear Commissioners:

I am writing to comment on the Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass dated February 2022. Thank you for the opportunity to comment on this important document.

I am a recreational angler who lives in Connecticut and fishes primarily for striped bass in Long Island Sound. Over the past five years, I have spent at least 50 days on the water in Long Island Sound in pursuit of striped bass. I fish both from a boat and from shore. I own a boat along with a partner, which is moored in a Connecticut marina, hire Connecticut-based guides several times a year, and purchase fishing gear and supplies in Connecticut tackle shops. While I primarily fish in Connecticut, I have also fished for striped bass in New Jersey, New York, Rhode Island, Massachusetts, and Maine over the past five years.

I have not kept a single striped bass over those five years and do not foresee ever keeping a striped bass. I make every effort to apply best practices in catch and release fishing with the goal of returning fish to the water healthy. I fish entirely with single-hooked artificial lures. I enjoy catching healthy schoolies and am thrilled when conditions align and I catch the occasional slot or larger bass. For me, fishing is as much about the experience on the water, in nature, pursuing healthy wild fish as it is about catching those fish. That said, if the opportunity to catch fish disappeared entirely because of the decline in striped bass I would spend significantly less time and resources on the water. For me, the striped bass, more than any other wild living thing, embodies the hope that nature can persist in spite of all that we have done and are doing to destroy it.

My comments on Draft Amendment 7 stem from my growing understanding of the biology of striped bass and the threats they face, how I choose to engage with the shared resource, and a belief that those of us who fish for striped bass have the greatest responsibility to protect them. My comments are informed by the following propositions:

- 1) Atlantic striped bass are long-lived wild fish that breed in and migrate through some of the densest population centers in the world in waters that have been significantly impacted by pollution, development, and climate change.
- 2) Atlantic striped bass are stochastic breeders that in normal times have at best intermittent good breeding years.
- 3) Atlantic striped bass breed when they reach about 28" in length and produce exponentially more eggs as they get larger.
- 4) Atlantic striped bass populations were nearly wiped out in the 1980s, built back up in the 1990s and early 2000s, and have been declining largely due to overfishing since about 2006.
- 5) To protect the future of Atlantic striped bass we need to do everything we can to maximize the abundance of breeding fish immediately and into the future.
- 6) Since natural mortality, environmental conditions, and fishing mortality combine to reduce striped bass populations and there is little we as anglers can do to reduce natural mortality or environmental conditions, anglers have a responsibility to do what we can to reduce fishing mortality.
- 7) Atlantic striped bass are a shared resource—no stakeholder has any more of a right to kill a striped bass than any other, all stakeholders will benefit from increased abundance, and all stakeholders should be prepared to alter their behavior to benefit striped bass abundance.

Based on those principles, my comments on Draft Amendment 7 are as follows:

1. Tier 1 Fishing Mortality Management Triggers
  - a. Option A (Timeline to Reduce F to the Target)
    - i. I support sub-option A1 (status quo): we are already behind in rebuilding the striped bass stock. Any delay will lead to further decline.
  - b. Option B (F Threshold Triggers)
    - i. I support sub-option B1 (status quo): since F has the most significant manageable impact on striped bass abundance, we should move quickly to manage F when striped bass are in decline.
  - c. Option C (F Target Triggers)
    - i. I support sub-option C1 (status quo): since F has the most significant manageable impact on striped bass abundance, we should move quickly to manage F when striped bass are in decline.
2. Tier 2 Female Spawning Stock Biomass Management Triggers
  - a. Option A (Deadline to Implement a Rebuilding Plan)
    - i. I support sub-option A2 (2-year deadline): maximizing spawning stock biomass is the only way to ensure striped bass thrive into the future.
  - b. Option B (SSB Threshold Trigger)
    - i. I support sub-option B1 (status quo): we must do everything we can to protect\increase spawning stock biomass.
  - c. Option C (SSB Target Trigger)
    - i. I support sub-option C1 (status quo): we must do everything we can to protect\increase spawning stock biomass.
3. Tier 3 Recruitment Triggers
  - a. Option A (Recruitment Trigger Definition)
    - i. I support sub-option A3 (the most sensitive trigger): low recruitment increases the value of every striped bass already in the coast-wide stock. Our management of the existing stock must be based on the overall health of the striped bass population present and future. If the triggers had tripped in the 2010s, striped bass populations may be in better shape today.
  - b. Option B (Management Response to Recruitment Trigger)
    - i. I support sub-option B2 (one-point reference): F profoundly impacts striped bass abundance and should be managed quickly in years of low recruitment.
4. Tier 4 Deferred Management Actions
  - a. Option A (Status Quo)
    - i. I support Option A (status quo): If a management trigger is tripped during an assessment or benchmark, management action should not be deferred. Again, deferring management actions could have long-term negative impacts on striped bass abundance.
5. Measures to Address Recreational Release Mortality
  - a. Option B (Seasonal Closures)
    - i. I support sub-option B2-b (no targeting-spawning closure required): due to the importance of spawning stock biomass and the clear impacts that even catch-and-release fishing have on the health of spawning age striped bass, protecting spawning striped bass should be a priority. It is unfortunate and very short-sighted that there is no option to protect spawning striped bass from commercial fishing as well as recreational fishing in this document nor is there an option to create a moratorium on harvesting any striped bass, so this seems to be the best option presented to protect spawning fish. If future stock assessments show a continued decline in the striped bass, I would hope that eliminating harvest entirely would be an option.

- b. Option C (Additional Gear Restrictions)
    - i. I support sub-options C1 and C2: again, this document is short on several other gear restrictions that could reduce recreational catch-and-release mortality, namely requirements for single barbless hooks and artificial lures. While there may not be data on the efficacy of such restrictions for striped bass, these restrictions have proven useful in preserving other fish species.
  - c. Option D (Outreach and Education)
    - i. I support sub-option D1 (outreach and education required): anglers should be provided with this information upon signing up for licenses, etc.
6. Rebuilding Plan
- a. Recruitment Assumption for Rebuilding Calculation
    - i. I support Option B (lower recruitment assumption): Striped bass are stochastic breeders and may not even have a good recruitment year in a decade. This should be considered in implementing management.
  - b. Rebuilding Plan Framework
    - i. I support Option B (Board action can implement management): Some action may be required in the interim between studies that might trigger management. As long as the Board action is designed to increase striped bass abundance, they should be able to act quickly if necessary.
7. Management Program Equivalency
- a. Option B (Restrict the Use of Conservation Equivalency based on Stock Status)
    - i. I support sub-option B1-b (CE cannot be used unless biomass is at the target level): if it is the target, isn't it worth aiming for?
    - ii. I support sub-option B2-a-c (restrictions should be applied to all the fisheries)
  - b. Option C (Precision Standards for MRIP Estimates)
    - i. I support sub-option C3 (no error greater than 30%)
  - c. Option D (Conservation Equivalency Uncertainty Buffer)
    - i. I support sub-option D1 (10% uncertainty buffer)
  - d. Option E (Definition of Equivalency)
    - i. I support sub-option E2 (percent reduction\liberalization at the State level)

Thank you for your attention and efforts on behalf of striped bass abundance,

Todd Forrest

Ridgefield, Connecticut

**From:** [COLIN ARCHER](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Ammendment 7  
**Date:** Friday, March 11, 2022 6:23:22 AM

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ASMFC-

Thanks for asking the angling community for some input. I speak for myself that most of the science and information in the Draft Amendment is over my head and more than the average angler can process and put into laymen terms. Striped bass numbers have been decreasing for several reasons. As several factors continue to change, the bass have changed with them. New Jersey is, in my opinion, the best fishery we have for striped bass on the East Coast. While I wish regulations were coastwise and not by the individual state, I will speak for New Jersey since this is where I fly fish personally and on a part time basis run a fly fishing only charter business, both walk and wade and boat charters. Catch and release only.

New Jersey has the only productive 11 month fishery on the East Coast. Bays and rivers are closed Jan and Feb, but bass can still be caught oceanside in January. With that we have heavy fishing pressure, mostly from the boats, as the bait and bass migration and beach replenishment has changed where the highest percentage of bass are, and that is off the beach and in the bays, and the heaviest concentrations are in the Raritan Bay and Upper and Lower New York Bays. We're not sure which strain of bass these are, early Hudson, late Delaware or Chesapeake, or from some other natal river. Either way, once the bass congregate, either out along the beach or in the channels of the bays, the boats set up on numbers and the harvesting, regardless of the size limits begin, and add NJ's Bonus Tag Program, and its dead fish after dead fish, day after day, after day. Three man boats catching over 100 fish an outing times however many boats, plus what they harvest, and the 9% mortality rate, adds up to a lot of dead fish. Then throw in the headboats, that's even more dead bass.

Please know this is not an anti-boat letter, but that is where the bulk of the catching is done. The elimination of the snag and drop fishery and the move to circle hooks, if it is occurring, has been beneficial I am sure. The new size limit, while good I guess according to the science, keeps the over 38 inch fish alive, if caught and released properly, but really hammers the 28-38 inch fish, along with the smaller slot fish NJ allows in the Bonus Tag Program and Maryland's smaller size limit. Too many dead fish means lower numbers.

In my humble opinion, striped bass should be a game fish. Catch and release only. Maybe artificial lures only, with the elimination of multi treble hooks on lures. That may be a delusional request, I know. So what would be some possible solutions? There is talk of shutting down spawning grounds, or pre spawning areas for two weeks, I don't think that does anything. 14 days minus a few days due to weather and early season weather keeps the bulk of anglers still in preparation mode. It will be an all out slaughter the up to the day before day one and start back up on day 15. Maybe that would be a better plan for the bays in the fall, I don't think so in the spring. I think a better plan for the bass would be to institute a catch and release regulation, coastwise, during those times in certain places, to reduce the harvest and killing of striped bass.

Possibly make the Raritan and NY Bays catch and release only in April and November, Cape Cod Canal catch and release only in August and September, and Montauk in September and October. Not picking on any one spot, but these pinch points have to be slowed down. I don't want to take away someones privilege of fishing, but making it catch and release during those times, allows for enjoyment of the sport, and a reduction in dead bass.

I hope you actually read this and I thank you for your work and the opportunity to comment,

Captain Colin Archer

The Average Angler  
theaverageangler.blogspot.com  
732 261 7291

New Jersey



From: [Rita Thompson](#)  
To: [Comments](#)  
Subject: [External] Striped bass amendment 7  
Date: Thursday, March 10, 2022 7:58:20 PM

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**Please consider the following actions to save striped bass:**

**Tier 1 F Target Triggers**

**Option A: Timeline to reduce F to the target**

**I support Sub-option A1.** Reduce F to a level that is at or below the target within one year.

-Delaying action will get us nowhere but further from our goal of strengthening this fishery. Reducing the number of fish being removed from the fishery will only benefit the fishery as a whole.

**Option B: F Threshold Triggers**

**I support Sub-option B1.** If F exceeds the F threshold the SBMP must be adjusted to reduce F to the desired level within the time frame in option A1.

-Again delaying action will only continue to hurt the fishery.

**Option C: F Target Triggers**

**I support Sub-option C1.** If F exceeds the F target for two consecutive years and the spawning female SB fall below the target in either of those years the SBMP must be adjusted to reduce F to a level at or below the threshold within the option A timeframe.

-This stays in line with the previous options and denotes a relation between F and Spawning Female Striped Bass.

**Tier 2: SSB Triggers**

**Option A: Implementing Rebuilding Plan**

**I Support Sub-option A2.** The shorter the deadline for implementing a SSB rebuilding plan the better.

-Obviously this must be within reason in order to be realistic and be effective. Implementing a rebuilding plan within 2 years of a trigger seems to do that. Again the sooner the better. **Striped bass were declared overfished in 2018. There has still been no rebuilding plan implemented or established. This is a problem. This option would prevent this happening in the future.**

**Option B: SSB Threshold Trigger**

**I support Sub-option B1.** The Striped Bass Management Program must be adjusted to rebuild the biomass within an established time frame. If the stock becomes over fished, which many feel it currently is. It needs to be addressed as soon as possible. Cannot exceed 10 years. Much sooner would be preferred and I could argue that sooner is necessary.

### **Option C: SSB Target Trigger**

**I support Sub-option C1.** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years]. **Sooner is better.**

### **Tier 3: Recruitment Triggers**

#### **Option A: Recruitment trigger definition**

**I support Sub-option A3.** The trigger needs to be updated immediately. It has not been tripped for the coastal stock which is a major issue. It has been tripped 1 time since 2003 for NC which is a clear and definitive example of why it must be updated. My **second choice** would be **Option A2**

#### **Option B: Management Response to trigger**

**I support Sub-option B2.** We must be responsive to recruitment triggers. We must listen to the science and stop exploiting strong year classes and ignoring the poor ones.

### **Tier 4: Deferred Management Action**

**I support Option A.** There should be **no** deferred management action **without exception.**

### **4.2.2 Addressing Recreational Release Mortality**

**I support Sub-option C1.**

**I support Sub-option C2. There is no reliable data to quantify the effects any proposed C&R targeting closures would have. Especially while leaving the nets in spawning/staging areas.**

### **Option D: Outreach and Education**

**I support Sub-option D2.**

### **4.4 Rebuilding Plan:**

We are in a very bad position with the striped bass stock. When the latest stock assessment was accepted in 2019, we curbed the F rate through Addendum VI. We did not address rebuilding. That means we have less time to get the job done. The poor recruitment in the Chesapeake is making this situation far worse. We don't have good year classes to rely upon.

If you go back in time to 2012, many concerned anglers were ringing the alarm bells about the stock. We knew from the numbers that striped bass SSB would be overfished by 2017. But the numbers for the 2011 year-class showed it was the fourth-best on record. Rather than take a greater-than-30% reduction in harvest, we bet on the 2011 year-class. The Chesapeake, meanwhile, only took a 20.5% reduction. The 2011s were going to save the day.

Unfortunately, Maryland decimated the 2011s and the cohort did not recruit to the coastal

migratory stock in the numbers we all wanted.

Fast forward to today and it is 2022, three years after a rebuilding plan should have been in place, and we are watching a stock in freefall with no year classes to replace them. What does rebuilding look like now?

**4.4.1**

**I support Option B.**

**4.4.2**

**I support Option B.**

**4.6.2**

**I support Sub-option B1.** Restrict the use of CE

**Option C:**

**I support Sub-option C3.**

**Option D:**

**I support Sub-option D2.**

**Option E:**

**I support Sub-option E2.**

Rita Thompson



**From:** [Dan Sheehan](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Management Options  
**Date:** Thursday, March 10, 2022 7:51:14 PM

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I support catch and release only during April and May, but do not support any closures. The slot fish and circle hook regulations need to be given time to work before onerous new restrictions are imposed.

Thank you  
Dan Sheehan

Sent from my iPhone

**From:** [arthur.romaine](#)  
**To:** [Comments](#)  
**Cc:** [David Blinken](#)  
**Subject:** [External] Subject: Draft Amendment 7  
**Date:** Thursday, March 10, 2022 6:55:53 PM

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Members of the ASMFC

I write today to focus on the four (4) main issues at hand during the public comment period on Amendment 7 to the Striped Bass Management Plan.

In writing to you, I have one overriding concern - there should be more striped bass.

We all acknowledge the reason Amendment 7 is being considered - there were more striped bass in the early 2000's than there are now. Finger pointing is a waste of time at this point - although it's pretty clear where the fault lies. So now the proper action needs to be taken by the AMSFC that will 1/ return Striped Bass stocks to where they were 20 years ago, and 2/ have a plan in place that would prevent mistakes being made again.

My strongest recommendations are as follows:

## 4.1 Management Triggers

### TIER 1 Fishing Mortality Trigger

- Option A-1 Status Quo
- Option B-1 Status Quo
- Option C-1 Status Quo

### Tier 2 Female Spawning Stock Biomass (SSB) Management Triggers

- Option A-2 2-year deadline to rebuild SSB
- Option B-1 Status Quo
- Option C-1 Status Quo

### Tier 3 Recruitment Triggers

- Option A-2 Recruitment triggered when ANY of NY NJ MD VA show index values <75% of all values in the respective JAI for 1992- 2006, which represents a period of high recruitment, for 3 consecutive years.
- Option B-2

### Tier 4 Deferred Management Action

- Option A No deferred management action should be allowed

## 4.2.2 Recreational Release Mortality

- Option C-1
- Option D-2

## 4.4 Rebuilding Plan

### 4.4.1 Recruitment assumption for rebuilding calculation

- Option B Rebuild female SSB to the SSB target level no later than 2029.

### 4.4.2 Rebuilding Plan Framework

- Option B

### 4.6.2 Management Program Equivalency

- Option B-1-a
- Option C-3
- Option D-2
- Option E-2

Thank you  
Arthur Romaine  
PO Box 862  
Bridgehampton NY 11932

**From:** [ltm7575](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, March 10, 2022 2:36:06 PM

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I have fished the waters around Long Island since I was born, got my first job in a tackle shop at 13 years old and I am writing this letter because I am extremely concerned about the current status of the striped bass fishery. I am concerned that with the collapse of the fishery many families in the Northeast will lose their income, way of life and a part of their culture. This culture of Striped Bass fishing has driven the economy in so many ways. From tackle shops and charter boats to restaurants and hotels. We have seen this fishery collapse before and we have rebuilt it. We can do it again and if we act soon enough we will be able to avoid a moratorium. Avoiding a moratorium will be best for commercial and recreational fishermen alike. I respectfully ask that the committee takes my opinions into consideration when finalizing amendment 7.

First I would like to see fishing mortality triggers in place to ensure swift and effective action is taken to protect our fish, livelihood and shared culture. For section 4.1-Tier 1 Option A I would like to see the committee support sub-option A1. The one year target is beneficial to the fish, the recreational fisherman and the commercial fisherman. For Threshold Triggers I would like to see the committee support sub-option B1. As far as Target Triggers I support sub-option C1. For Tier 2: SSB Triggers Option A I support the two year deadline under sub-option A2. For Option B SSB Threshold Trigger I support sub-option B1 and for SSB Target Triggers I support sub-option C1. Under Tier 3 I support sub-option A2 and B2. For Tier 4 I support option A.

To address 4.2.2 measures to address recreational release mortality I believe that options C1, C2 and D2 are common sense measures that will combat the issue. I believe that education on proper gear and proper fish handling techniques are the most important thing we can do to decrease post release mortality.

Under section 4.4.1 I support option B. Under 4.4.2 I support option B to ensure a timely rebuilding of the Striped Bass fishery.

As for 4.6.2 management program equivalency, I believe that this is the most important part of rebuilding our fishery. It seems to me as though all other efforts would be immediately undermined if this is not dealt with. If one or two states are continued to be permitted to continue the overharvest of the stock then all other efforts have been a waste. The fact that Striped Bass are a migratory species makes it common sense that all states should be on the same page with regulations. We cannot allow individual states to get away with destroying the culture and livelihood of individuals and families from neighboring states through overfishing. This needs to be controlled for any

other measures to work as planned. For these reasons I support sub-options B1-a, C3, D2 and E2.

I respectfully ask that you please take my opinions into consideration in your decision making process. We all have an opportunity to save this fish but we must get it right this time. If we do not I fear that a collapse followed by a moratorium is inevitable. Let us act now so that we can avoid a moratorium so that our local economies can continue to thrive and the culture of Striped Bass fishing will be preserved. Let your legacy show that this is a prime example of good conservation. When people from different backgrounds and different motivations come together for the common good of the fish and the people that fish for them. This will benefit commercial fisherman, recreational fisherman, tackle shop owners and anyone who participates in the tourism and service industries on the Striper coast. Thank you all for what you do to protect and preserve our waters.

Best regards,

Liam McGoldrick

**From:** [Bill Thompson](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7 Public Comment  
**Date:** Thursday, March 10, 2022 1:05:49 PM

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Atlantic States Marine Fisheries Commission,

I would like to voice my support for the following changes to the management of our Striped Bass fishery.

### **Tier 1 F Target Triggers**

#### **Option A: Timeline to reduce F to the target**

**I support Sub-option A1.** Reduce F to a level that is at or below the target within one year.

-Delaying action will get us nowhere but further from our goal of strengthening this fishery. Reducing the number of fish being removed from the fishery will only benefit the fishery as a whole.

#### **Option B: F Threshold Triggers**

**I support Sub-option B1.** If F exceeds the F threshold the SBMP must be adjusted to reduce F to the desired level within the time frame in option A1.

-Again delaying action will only continue to hurt the fishery.

#### **Option C: F Target Triggers**

**I support Sub-option C1.** If F exceeds the F target for two consecutive years and the spawning female SB fall below the target in either of those years the SBMP must be adjusted to reduce F to a level at or below the threshold within the option A timeframe.

-This stays in line with the previous options and denotes a relation between F and Spawning Female Striped Bass.

### **Tier 2: SSB Triggers**

#### **Option A: Implementing Rebuilding Plan**

**I Support Sub-option A2.** The shorter the deadline for implementing a SSB rebuilding plan the better.

-Obviously this must be within reason in order to be realistic and be effective. Implementing a rebuilding plan within 2 years of a trigger seems to do that. Again the sooner the better. **Striped bass were declared overfished in 2018. There has still been no rebuilding plan implemented or established. This is a problem. This option would prevent this happening in the future.**

#### **Option B: SSB Threshold Trigger**

**I support Sub-option B1.** The Striped Bass Management Program must be adjusted to rebuild the biomass within an established time frame. If the stock becomes over fished, which many feel it

currently is. It needs to be addressed as soon as possible. Cannot exceed 10 years. Much sooner would be preferred and I could argue that sooner is necessary.

### **Option C: SSB Target Trigger**

**I support Sub-option C1.** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years]. **Sooner is better.**

### **Tier 3: Recruitment Triggers**

#### **Option A: Recruitment trigger definition**

**I support Sub-option A3.** The trigger needs to be updated immediately. It has not been tripped for the coastal stock which is a major issue. It has been tripped 1 time since 2003 for NC which is a clear and definitive example of why it must be updated. My **second choice** would be **Option A2**

#### **Option B: Management Response to trigger**

**I support Sub-option B2.** We must be responsive to recruitment triggers. We must listen to the science and stop exploiting strong year classes and ignoring the poor ones.

### **Tier 4: Deferred Management Action**

**I support Option A.** There should be **no** deferred management action **without exception.**

#### **4.2.2 Addressing Recreational Release Mortality**

**I support Sub-option C1.**

**I support Sub-option C2.** **There is no reliable data to quantify the effects any proposed C&R targeting closures would have. Especially while leaving the nets in spawning/staging areas.**

#### **Option D: Outreach and Education**

**I support Sub-option D2.**

#### **4.4 Rebuilding Plan:**

We are in a very bad position with the striped bass stock. When the latest stock assessment was accepted in 2019, we curbed the F rate through Addendum VI. We did not address rebuilding. That means we have less time to get the job done. The poor recruitment in the Chesapeake is making this situation far worse. We don't have good year classes to rely upon.

If you go back in time to 2012, many concerned anglers were ringing the alarm bells about the stock. We knew from the numbers that striped bass SSB would be overfished by 2017. But the numbers for the 2011 year-class showed it was the fourth-best on record. Rather than take a

greater-than-30% reduction in harvest, we bet on the 2011 year-class. The Chesapeake, meanwhile, only took a 20.5% reduction. The 2011s were going to save the day. Unfortunately, Maryland decimated the 2011s and the cohort did not recruit to the coastal migratory stock in the numbers we all wanted. Fast forward to today and it is 2022, three years after a rebuilding plan should have been in place, and we are watching a stock in freefall with no year classes to replace them. What does rebuilding look like now?

#### **4.4.1**

**I support Option B.**

#### **4.4.2**

**I support Option B.**

#### **4.6.2**

**I support Sub-option B1.** Restrict the use of CE

**Option C:**

**I support Sub-option C3.**

**Option D:**

**I support Sub-option D2.**

**Option E:**

**I support Sub-option E2.**

Thank you,  
Bill Thompson  
Financial Advisor  
Raymond James & Associates, Inc.  
20 Montchanin Road  
Greenville, DE 19807  
(302) 656-1534  
(302) 656-1737

Raymond James & Associates, Inc. member NYSE/SIPC.

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**From:** [Terms And Policy](#)  
**To:** [Comments](#)  
**Subject:** [External] Stripe Bass on the Hudson River  
**Date:** Thursday, March 10, 2022 1:05:11 PM

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To whom it my concern.

My opinion is that the Striper Season along the New Jersey Shore AKA Reardon Bay should be closed until the Stripers return from spawning in the Hudson River. Catching and killing all of those fish before they spawn is ridiculous in my opinion. You also need to cut back the tonnage the commercial fisher man can keep.

Sincerely Capt. Dan Lussier.

[Sent from the all new AOL app for Android](#)

**From:** [Brennan Thompson](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Amendment 7 Public comment  
**Date:** Thursday, March 10, 2022 11:48:04 AM  
**Attachments:** [image001.png](#)

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Atlantic States Marine Fisheries Commission,

I would like to voice my support for the following changes to the management of our Striped Bass fishery. It is clear to everyone throughout the striper coast that these fish are in trouble once again for numerous reasons. Taking action now is what many in the community want to see. There is a major level of frustration and anger throughout the striper coast with the current management of this fishery. Every interest group (commercial, recreational, etc.) is going to need to make equally significant sacrifices and we need to use reliable and accurate information to choose what sacrifices need to be made. Lets start holding those accountable who are exploiting the fishery in MD and VA. Some of the netting both legal and illegal needs to be addressed. As well as recreational targeting in designated spawning areas. Please manage this fishery effectively.

### **Tier 1 F Target Triggers**

#### **Option A: Timeline to reduce F to the target**

**I support Sub-option A1.** Reduce F to a level that is at or below the target within one year.

-Delaying action will get us nowhere but further from our goal of strengthening this fishery. Reducing the number of fish being removed from the fishery will only benefit the fishery as a whole.

#### **Option B: F Threshold Triggers**

**I support Sub-option B1.** If F exceeds the F threshold the SBMP must be adjusted to reduce F to the desired level within the time frame in option A1.

-Again delaying action will only continue to hurt the fishery.

#### **Option C: F Target Triggers**

**I support Sub-option C1.** If F exceeds the F target for two consecutive years and the spawning female SB fall below the target in either of those years the SBMP must be adjusted to reduce F to a level at or below the threshold within the option A timeframe.

-This stays in line with the previous options and denotes a relation between F and Spawning Female Striped Bass.

### **Tier 2: SSB Triggers**

#### **Option A: Implementing Rebuilding Plan**

**I Support Sub-option A2.** The shorter the deadline for implementing a SSB rebuilding plan the better.

-Obviously this must be within reason in order to be realistic and be effective. Implementing a rebuilding plan within 2 years of a trigger seems to do that. Again the sooner the better. **Striped**

**bass were declared overfished in 2018. There has still been no rebuilding plan implemented or established. This is a problem. This option would prevent this happening in the future.**

#### **Option B: SSB Threshold Trigger**

**I support Sub-option B1.** The Striped Bass Management Program must be adjusted to rebuild the biomass within an established time frame. If the stock becomes over fished, which many feel it currently is. It needs to be addressed as soon as possible. Cannot exceed 10 years. Much sooner would be preferred and I could argue that sooner is necessary.

#### **Option C: SSB Target Trigger**

**I support Sub-option C1.** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years]. **Sooner is better.**

#### **Tier 3: Recruitment Triggers**

##### **Option A: Recruitment trigger definition**

**I support Sub-option A3.** The trigger needs to be updated immediately. It has not been tripped for the coastal stock which is a major issue. It has been tripped 1 time since 2003 for NC which is a clear and definitive example of why it must be updated. My **second choice** would be **Option A2**

##### **Option B: Management Response to trigger**

**I support Sub-option B2.** We must be responsive to recruitment triggers. We must listen to the science and stop exploiting strong year classes and ignoring the poor ones.

#### **Tier 4: Deferred Management Action**

**I support Option A.** There should be **no** deferred management action **without exception.**

#### **4.2.2 Addressing Recreational Release Mortality**

**I support Sub-option C1.**

**I support Sub-option C2.** There is no reliable data to quantify the effects any proposed C&R targeting closures would have. Especially while leaving the nets in spawning/staging areas.

#### **Option D: Outreach and Education**

**I support Sub-option D2.**

#### **4.4 Rebuilding Plan:**

We are in a very bad position with the striped bass stock. When the latest stock assessment was accepted in 2019, we curbed the F rate through Addendum VI. We did not address rebuilding. That means we have less time to get the job done. The poor recruitment in the Chesapeake is making this situation far worse. We don't have good year classes to rely upon.

If you go back in time to 2012, many concerned anglers were ringing the alarm bells about the stock. We knew from the numbers that striped bass SSB would be overfished by 2017. But the numbers for the 2011 year-class showed it was the fourth-best on record. Rather than take a greater-than-30% reduction in harvest, we bet on the 2011 year-class. The Chesapeake, meanwhile, only took a 20.5% reduction. The 2011s were going to save the day. Unfortunately, Maryland decimated the 2011s and the cohort did not recruit to the coastal migratory stock in the numbers we all wanted.

Fast forward to today and it is 2022, three years after a rebuilding plan should have been in place, and we are watching a stock in freefall with no year classes to replace them. What does rebuilding look like now?

#### **4.4.1**

**I support Option B.**

#### **4.4.2**

**I support Option B.**

#### **4.6.2**

**I support Sub-option B1.** Restrict the use of CE

**Option C:**

**I support Sub-option C3.**

**Option D:**

**I support Sub-option D2.**

**Option E:**

**I support Sub-option E2.**

**Brennan C. Thompson**

Financial Advisor, AAMS®

RAYMOND JAMES & ASSOCIATES

20 Montchanin Road, Suite 280

Greenville, Delaware  
Phone: 302-656-1534  
Fax: 302-656-1737



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**From:** [Flynn Willsea](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Thursday, March 10, 2022 8:58:29 AM

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To whom it may be concerned,

My name is Flynn Willsea, I am an angler that lives on the southern coast of Maine. Every summer I spend my mornings and evening and just about every free moment I have, fishing for striped bass with a fly rod. The striped bass is a fish that is incredibly close to my heart. I believe we need to do everything in our ability to protect this fish and guarantee that they will be around for future generations. The best way to do this is to act. Striped bass management board must act when a management trigger is switched. What I would like to see happen is a moratorium on all striped bass harvesting, commercial and recreational. Give the fish a break and allow the fish to be recruited into the coastal migratory stock. Why not make the striper a sport fish just as tarpon permit and bonefish are.

I pray that the next generation will still be able to enjoy this amazing natural resource.

**From:** [Joseph Camilliere](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Amendment Comments  
**Date:** Thursday, March 10, 2022 7:00:33 AM

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Thank you for the great work on helping to reduce the pogie harvest in the Atlantic' It would be great to further reduce or eliminate all together. I fish from the beaches around Gloucester for Stripers, and after those Pogie Seins come through the striper fishing is over!!!! Maybe they should be required to stay off shore a few miles! I can cast to them they are in so close.

I think the reduction of treble hooks was a good move in bait and live lining. Why not ban them all together, including on lures. I fish for Salmon in Washington State and you can only use barbless, single hooks!!!! Why not do that here, the "catch and release " crowd should love it.

I think a better information program on how to release and reduce stress on fish will help educate people. Everyone I know claims catch and release mortality is only 6-8%. I find that hard to believe and would not be surprised if it was as high as 20% or more. I have fished many rivers in Wyoming and Washington that have "rolling closure" in sensitive parts of the river and "afternoon" closure in the summer to reduce the additional stress of warmer waters. When I fish in Washington, you have to check the regulations every day, because of how often they amend and restrict the fishing .

Why are Chartered Boats and Guides considered recreational? They catch and kill for money! Shouldn't they all be commercial??

And if you are going to keep a few recreational fish for "the Table", why not purchase "Striper Kill Tags"! Could raise a little money for research and provide more accurate catch data. In addition to my Hunting License, I also pay for Doe Tags, Turkey Tags, Waterfowl Tags,ect. Maybe \$5.00 for a "Keeper" and a larger additional "Trophy" charge for that fish of a lifetime.,

Keep up the good work, and I hope my comments were helpful.

--

Joseph Camilliere, Arborist  
[josephcamilliere@gmail.com](mailto:josephcamilliere@gmail.com)  
978-904-1672





**From:** [Keyen Farrell](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, March 9, 2022 7:50:35 PM

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To the Atlantic Striped Bass Board:

I am writing in strong support of the conservative options to manage Striped Bass in the draft of Amendment 7. Sharing striper fishing with my family is one of the greatest joys in my life. I spend three days per week on Long Island Sound Spring to Fall and it doesn't take a fisheries scientist to know that striper abundance has declined steadily over the past decade or so, with some short-lived exceptions of great fishing in my experience. Over that time, my attitude toward the resource and that of my friends has changed. I wasn't fishing when the stock crashed in the 1980s, but I appreciate now more than ever that it is a limited resource that should be protected with conservative, early action.

I have tried my best to understand Amendment 7 and it is clearly a technical document. What concerns me about some of the sub options is that they are risky. They **COULD** be fine, but some count on one bad year being a statistical fluctuation for example, and by extension, rely on some degree of luck. For example, Trigger 3, sub option C2. I'd much rather have a false alarm and have regulations enacted quickly on a stock that turns out to be healthier than thought than risk falling into a deep hole that later requires bigger cuts to get out of later.

I urge the board to take a conservative route that will make us the best possible stewards of the species and in the long term, increase the enjoyment of everyone who uses the resource. Below are my positions listed out. If I can help in any other way, please let me know and thank you for your work to restore the stock!

#### 4.1 Management Triggers

##### **Fishing Mortality Triggers**

- Option A: sub-option A1
- Option B: sub-option B1
- Option C: sub-option C1

##### **SSB Triggers**

- Option A: sub-option A2
- Option B: Sub-option B1
- Option C: Sub-option C1

##### **Recruitment Triggers**

- Option A: Sub-option A2
- Option B: Sub-option B2

### **Deferred Management Plan:**

- Option A: status quo. I think any deferral of the management plan is risk that should not be taken

#### 4.2.2 Measures to Address Release Mortality

- Option C: sub option C1 this is a no-brainer for me
- Option C: sub-option C2 this is also a no-brainer for me

#### 4.4 Rebuilding Plan

##### **Recruitment Assumption for rebuilding**

- Option B: yes Option B

##### **Rebuilding Plan Framework:**

- Option B: yes to Option B

#### 4.6.2 Management Program Equivalency

- Option B: sub-option B1-a
- Option C: no comment I don't understand this.
- Option D: no comment I don't understand this.
- Option E: no comment I don't understand this.

**From:** [Peter Laurelli](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, March 9, 2022 3:58:00 PM

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Dear caretakers of a valuable natural resource,

Over the last 15 years, as I saw the changing sizes and numbers of striped bass shift from larger to smaller and from many to few, I became interested in understanding why exactly this was happening and what was being done to change the trajectory. In the process, I learned of the of conservation measures in place, and the power of the ASMFC. As I listened to meetings and witnessed how the science was urgently pointing to the need for the committee to follow its own rules for striped bass management, rather than being relieved this species had a faithful steward, it was instead disgustingly clear the effectiveness of the ASMFC was being restrained by the selfishness of a few to the detriment of many.

Because of this, my first comment is that the board in charge of Atlantic Striped Bass management within the ASMFC should be ashamed of itself, absolutely ashamed it has led this species down a path that has left it more vulnerable than the board's own rules would allow. While there are many members of the committee who have operated on good faith and to the best of their abilities in favor of responsible management, the ASMFC as a whole must bear the weight of its failure. Unfortunately, the few representatives who should be most ashamed of their voting records and of their arguments levied against the committee's own statutes are the ones least likely to be remorseful and/or change. To those representatives, rational words from the public mean nothing. For them, only time can bring with it an inevitable sense of regret, though I wish this wasn't true.

Moving on to Draft Amendment 7, I strongly support each of the American Saltwater Guides Association's formal positions on each of the four options in the draft amendment, which are listed at the bottom of this message.

Sincerely,

A father of young children, a lifetime fisherman of almost 50 years, a believer of science and of morality along with empathy, but unfortunately a disbeliever in the ability of the ASMFC to do its stated job for the striped bass population because of a few short-sighted individuals.

-Peter Laurelli

***Here is what I support:***

4.1 Management Triggers

Tier 1: Fishing Mortality (F) Triggers

Option A: Timeline to Reduce F to the Target

**I strongly support Sub-option A1 (status quo): Reduce F to a level that is at or below the target within one year.**

Option B: F Threshold Triggers

**I strongly support sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

Option C: F Target Triggers

**I strongly support sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

Tier 2: Spawning Stock Biomass (SSB) Triggers

Option A: Deadline to Implement a Rebuilding Plan

**I strongly support sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan.** The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

Option B: SSB Threshold Trigger

**I strongly support sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

Option C: SSB Target Trigger

**I strongly support sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

Tier 3: Recruitment Triggers

Option A: Recruitment Trigger Definition

**I strongly support sub-option A2:** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

Option B: Management Response to Recruitment Trigger

**I strongly support sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

Tier 4: Deferred Management Action

**I strongly support Option A (status quo): No Deferred Management Action.**

*If any (or all) of the management triggers are tripped following a benchmark stock assessment or*

*assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.*

#### 4.2.2 Measures to Address Recreational Release Mortality

##### Option C. Additional Gear Restrictions

**I strongly support sub-option C1: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.**

**I strongly support sub-option C2: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.**

##### Option D. Outreach and Education

**I strongly support sub-option D2: It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.**

#### 4.4 Rebuilding Plan

##### 4.4.1 Recruitment Assumption for Rebuilding Calculation

**I strongly support Option B: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.**

##### 4.4.2 Rebuilding Plan Framework

**I strongly support Option B: 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 recruitment assumption specified in Amendment 7) 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.**

##### 4.6.2 Management Program Equivalency (Conservation Equivalency)

##### Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status

**I strongly support sub-option B1-a: CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.**

##### Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals

**I strongly support sub-option C3: CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.**

##### Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries

**I strongly support sub-option D2: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.**

Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries

**I strongly support sub-option E2: the percent reduction/liberalization projected for the FMP standard at the state-specific level.**

**From:** [Chris Duryea](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [Ryan Duryea](#); [Jack Duryea](#)  
**Subject:** [External] Striped Bass Management  
**Date:** Wednesday, March 9, 2022 2:34:54 PM

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To the Advisors and Board members of the Atlantic States Marine Fisheries Commission:

Good Afternoon,

My name is Chris Duryea and I have been striped bass fishing for the last 45 of 51 years of my life. Some of the best times of my life have been on the water with my two sons and I want to make sure they have the opportunity to experience the same thing with their children. In recent years there has been a significant decline in the striped bass population on the east end of Long Island and something needs to be done ASAP. We can't pass the buck to any more future generations. We need to start tuning things around today.

As an organization serving the broad community of conservation-minded recreational saltwater anglers residing in and spending thousands of hours annually fishing the coastal waters along our Atlantic states, we welcome the opportunity for public commentary on the proposed Amendment 7 to the ASMFC Atlantic Striped Bass Management Plan. Protecting our striped bass stocks, safeguarding the recreational angling industry that relies on these fish, and ensuring that future generations of anglers can enjoy catching our coastal fishery are paramount to us. With this said, we wish to support the following options in the current Amendment 7 draft:

On 4.1 Management Triggers, we support:

Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality

Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold

Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions

Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, we support:

Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method

Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, we support:

Option B to use the more realistic and conservative low recruitment regime assumptions

to rebuild female SSB target levels no later than 2029. We recognize this option may require more restrictive management measures than option A, which we support

On 4.4.2 Rebuilding Plan Framework, we support:

Option B to allow the Board to take direct management actions as well as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, “Management program equivalency (also known as “conservation equivalency” or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

We believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically, we support:

Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level

Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates

Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries

Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

Thank you for providing the opportunity to comment on Amendment 7. We look forward to learning the outcome of the upcoming stock assessment and to reading the final version of the Amendment.

Respectfully,

Chris, Ryan, Jack Duryea

Sag Harbor, NY

Sent from my iPhone



**From:** [David Butler](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped bass (SB)comments  
**Date:** Wednesday, March 9, 2022 1:57:55 PM

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Thanks for listening to my comments

I am a 58 yr old MD lifelong resident. I have fished for rock since age 8. They are a terrific fish!

Please do what is biologically and scientifically correct to maintain the species.

The economic value of SB is far greater as a recreational resource than a commercial one. I have read this many times. Please make SB a game fish! This worked in Florida! I am not very political but my parents and I and hundreds of others chanted "rock fish game fish" on the steps of the capitol in Annapolis in 1987.. been a long time.

Please make the season and limits the same for recreational and charter boats.

Thanks again for listening

Dave Butler  
(410)382-1866

**From:** [Shirlee Winder](#)  
**To:** [Comments](#)  
**Subject:** [External] Protecting Fishing rights for EVERYONE  
**Date:** Wednesday, March 9, 2022 1:04:40 PM

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Dear Ms. Franke,

I support legislation that protects fishing rights for everyone AND environmental issues that concern the fishermen and women and the land and water.

My Grandmother, Mary Cornelius Winder, fought and won hunting and fishing rights for the Iroquois people in NYS. These rights should be available to ALL responsible people.

Thank you for the opportunity for allowing me to share my thoughts on this important issue.

Sincerely,

Shirlee Winder  
1101 Grandmother Moon  
Oneida, NY 13421  
[chiliwinter@yahoo.com](mailto:chiliwinter@yahoo.com)

**From:** [David Brower](#)  
**To:** [Comments](#)  
**Subject:** [External] Strip Bass Hatchery.  
**Date:** Wednesday, March 9, 2022 12:15:51 PM

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The Federal Govt and New York Dec should start a hatchery program similar to the salmon one on Lake Ontario. Years ago the Indian Pt power plant was required required to stock bass fry back into the river. Now that the plant is closed,I think this is the best solution for the whole east coast fishery.

David Brower  
Commissioner, Garrison Fire District

**From:** [Koch, Gregory E](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External]  
**Date:** Wednesday, March 9, 2022 12:02:25 PM

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**To: The people who will decide what my children get to do,**

#### **4.6.2 Management Program Equivalency (Conservation Equivalency)**

##### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

**I Support Sub-option B1-a:** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

##### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

**I Support Sub-option C3:** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

##### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

**I Support Sub-option D2:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

##### **Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

**I Support Sub-option E2:** the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Kind regards,  
Gregory Koch  
New Jersey

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**From:** [Lisa Doricchi](#)  
**To:** [Pat Woods](#); [Comments](#); [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Striped Bass  
**Date:** Wednesday, March 9, 2022 8:17:31 AM

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I am responding to the following issues as a stakeholder and policy follower for Striped Bass Management Plans.

#### **4.1 Management Triggers**

Tier 1: Fishing Mortality (F) Triggers

##### **Option A: Timeline to Reduce F to the Target**

**Sub-option A1 (status quo):** Reduce F to a level that is at or below the target within one year.

##### **Option B: F Threshold Triggers**

**Sub-option B1 (status quo):** If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

##### **Option C: F Target Triggers**

**Sub-option C1 (status quo):** If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

Tier 2: Spawning Stock Biomass (SSB) Triggers

##### **Option A: Deadline to Implement a Rebuilding Plan**

**Sub-option A2:** Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

##### **Option B: SSB Threshold Trigger**

**Sub-option B1 (status quo):** If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

##### **Option C: SSB Target Trigger**

**Sub-option C1 (status quo):** If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

Tier 3: Recruitment Triggers

### **Option A: Recruitment Trigger Definition**

**Sub-option A2:** The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)<sup>11</sup> shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

### **Option B: Management Response to Recruitment Trigger**

**Sub-option B2.** If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

Tier 4: Deferred Management Action

### **ASGA Supports Option A (status quo): No Deferred Management Action.**

If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

## **4.2.2 Measures to Address Recreational Release Mortality**

### **Option C. Additional Gear Restrictions**

**Sub-option C1:** Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of striped bass.

**Sub-option C2:** Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

### **Option D. Outreach and Education**

**Sub-option D2:** It is recommended states continue to promote best-striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

## **4.4 Rebuilding Plan**

### **4.4.1 Recruitment Assumption for Rebuilding Calculation**

**Option B:** Rebuild female SSB to the SSB target level by no later than 2029. F rebuild

is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

#### **4.4.2 Rebuilding Plan Framework**

**Option B:** 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 recruitment assumption specified in Amendment 7) 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.

#### **4.6.2 Management Program Equivalency (Conservation Equivalency)**

##### **Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status**

**Sub-option B1-a:** CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level. **NOT STATUS QUO CE has been abused.**

##### **Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals**

**Sub-option C3:** CE proposals would not be able to use Marine Recreational Information Program (MRIP) estimates associated with a percent standard error (PSE) exceeding 30%.

##### **Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries**

**Sub-option D2:** Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%.

##### **Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries**

**Sub-option E2:** the percent reduction/liberalization projected for the FMP standard at the state-specific level.





**From:** [Brian Kelly](#)  
**To:** [Comments](#); [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External]  
**Date:** Wednesday, March 9, 2022 7:43:54 AM

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I am writing in behalf and in support with Masters of the Fly and American Saltwater Guide Association. I am a guide in Plymouth Massachusetts. in my sentiments I hope that one day Stripped Bass can become a game fish. Stripers are more valuable alive then dead. With moderns day handling techniques and equipment anglers are more aware of release mortality and the majority are releasing with proper technique. As regards to Amendment 7 please read below.

To the Advisors and Board members of the Atlantic States Marine Fisheries Commission:

As an organization serving the broad community of conservation-minded recreational saltwater anglers residing in and spending thousands of hours annually fishing the coastal waters along our Atlantic states, we welcome the opportunity for public commentary on the proposed Amendment 7 to the ASMFC Atlantic Striped Bass Management Plan. Protecting our striped bass stocks, safeguarding the recreational angling industry that relies on these fish, and ensuring that future generations of anglers can enjoy catching our coastal fishery are paramount to us. With this said, we wish to support the following options in the current Amendment 7 draft:

On 4.1 Management Triggers, we support:

Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality

Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold

Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions

Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, we support:

Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method

Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, we support:

Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. We recognize this option may require more restrictive management measures than option A, which we support

On 4.4.2 Rebuilding Plan Framework, we support:

Option B to allow the Board to take direct management actions as well as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, “Management program equivalency (also known as “conservation equivalency” or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

We believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically, we support:

Option B1-a, which would prohibit CE

programs until stock biomass is above the threshold level

Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates

Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries

Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

Thank you for providing the opportunity to comment on Amendment 7. We look forward to learning the outcome of the upcoming stock assessment and to reading the final version of the Amendment.

Brian Kelly

March 9, 2022

Plymouth, Massachusetts

**From:** [Austin Sichling](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, March 8, 2022 9:10:56 PM

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Good Evening,

I was unfortunately unable to make the public hearing period tonight for the Virginia Marine Resources Commission (VMRC), so I wanted to send an email prior to the comment period ending.

I am actually a transplant recreational fisherman within Virginia but have been here for 8 fishing seasons. I have heard many stories of the plentiful striped bass along the Chesapeake Bay Bridge Tunnel and gannet "storms" of birds diving into the water late fall season. Unfortunately, I have not seen the numbers that were spoken about since I have been here.

I would like to comment on a few things on the draft amendment 7.

4.1 Management Triggers.

- Tier 3: Recruitment Triggers: I support Sub-option A2
- Tier 4: Deferred Management Plan: I support option A

4.4 Rebuilding Plan

-4.4.1 Recruitment assumption for rebuilding calculation - I support option B

-4.6.2 Management Program Equivalency - I support option B1-a

I hope one day to see that phenomena talked about in the beginning of this email. I believe that these options will be a step on the right direction to rebuilding the stock with the future in mind.

Thank you very much for your time and consideration,

Austin Sichling

**From:** [Randy Bethke](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, March 8, 2022 7:16:29 PM

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Hello,

My brief comments on proposed (draft) Atlantic Striped Bass Amendment 7:

- Need for an executive summary. The majority of your audience are not going to be able to digest this 149-page document. A one-page executive summary at the front of the document would be more informative.
- The use of soft language, such as "may" and "should" is far to commonplace in this document. There should be more firm plans in-place, and if not yet available, then this document is not yet ready.
- I agree with and support limited no-target closures, particularly during spawning seasons.

Thanks,

Randy Bethke

**From:** [Michael Lauri](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment 7 opposition  
**Date:** Tuesday, March 8, 2022 6:36:28 PM

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I am writing to oppose draft amendment 7 as written. I am strictly against the 2 week closure during spawning season in the Hudson River. This will not help the cause and correct the problem. There are states open to fishing all year, they need to close the season in late fall and winter seasons.  
I help the NY DEC take statistics on these fish each year which helps understand numbers caught, etc. don't take our great fishing away from our river system.

Thanks,

Michael Lauri  
242 Tompkins road  
Montgomery, ny 12549

Sent from my iPad

**From:** [MP](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, March 8, 2022 6:13:46 PM

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To Whom it May Concern,

This is my second year writing to the ASMFC regarding striped bass management and my opinions have not changed. Striped bass should be managed to become abundant again. Everyone benefits from an abundance of striped bass, it's as simple as that.

4.6.2 - conservation equivalency  
Option B: I support sub option B1-a.  
Option C: I support sub option C3  
Option D: I support sub option D2  
Option E: I support sub option E2

Mike

**From:** [takethelead@comcast.net](mailto:takethelead@comcast.net)  
**To:** [Comments](#)  
**Subject:** [External] draft amendment 7  
**Date:** Tuesday, March 8, 2022 4:29:05 PM

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Attached are my comments/suggestions. I already submitted these to one of the websites; not sure if it was this one or not.

#### COMMENTS:

We read all of the magazines and news articles relating to striped bass (rockfish) being overfished.

We are boat owners and also enjoy catching the species.

We believe strongly that all people engaged should have a valid license and follow the rules, as we do.

Three areas need to be addressed in the Chesapeake Bay (and elsewhere).

#### 1. Dead Discards

"Solution": Extend the closed weeks from the existing two, to three or even four, for the very hottest days in July and August. Alternatively, as an emergency measure, allow DNR to post an emergency closure of the season past the two-week moratorium, based on actual weather patterns, water temperature, and dissolved oxygen levels. In the Bay this extended moratorium could be regionalized. As a possible exception for Charter Boat Operators during these emergencies, they could continue to operate, but with reduced creel limits or an increase in minimum size for keepers.

#### 2. Increase Penalties

"Solution": Significantly raise the penalty for exceeding catch limit, undersized fish, and fishing without a license. For licensed individuals, suspend their license for the current year, future year, etc. based on criteria of severity of the infraction.

#### 3. Automatic Incarceration and Fines for Blatant Disregard of Our Laws

"Solution": Unlicensed individuals caught catching large quantities of striped bass, typically undersized, should be taken to the local jail and heavy fines imposed. They should not be released until the fines are satisfied after their hearing. Paying these fines shall include seizure of personal property that can be sold to satisfy the penalty, if they are not able to pay. Currently, these people are caught, cited, and fish seized; penalties ignored. Based on reported articles, a majority of these individuals are non-US citizens from 3rd world countries. A message needs to be sent to their community that as a bare minimum, they must respect our laws and regulations.



**From:** [IClaudius7](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7 - Striped Bass  
**Date:** Tuesday, March 8, 2022 3:20:17 PM

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As a recreational fisherman, I seriously doubt the efficacy of “Catch & Release” for a resource as delicate as large female striped bass. Simply stated, risking such large females for a “photo op” with a cow striped bass is simply stupid. LET THEM BE.

MANY RECREATIONAL FISHERMEN DON'T have the skill set to allow a safe “catch and release.” It's more like catch and maim a limited resource. The other aspect of this is enforcement of the poaching regulations by prosecutors and the judiciary. General deterrence is ineffective if light penalties are meted out regularly.

Cyrus S. Picken, Jr., Esquire  
1717 Wickham Way  
Crofton, Md 21114  
(301) 503-0577

**From:** [Matthew Risser](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Tuesday, March 8, 2022 2:54:04 PM

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To whom it may concern,

As a concerned and conservation minded fisherman, I offer the following comments on ASGA's Amendment 7 for Striped Bass management. While the technical descriptions of all of the various options are a bit overwhelming to someone that is not intimately involved with the process, I generally support the most conservative and fastest acting options to rebuild our collective striped bass fishery.

#### 4.1 Management Triggers:

- Teir 1, Fishing Mortality: I support the status quo for all options. Additionally, I support the strictest adherence to these triggers
- Teir 2, Spawning Stock Biomass: I support
  - Sub-option A2
  - Sub-option B1
  - Sub-option C1
- Teir 3, Recruitment:
  - Sub-option A2
  - Sub-option B2
  - Sub-option
- Teir4, Deferred Management Plan
  - Option A

#### 4.2.2 Measures to address Recreational Release Mortality

- Sub-option C1 and C2

#### 4.4.2 Rebuilding Plan Framework

- Option B

#### 4.6.2 Management Program Equivalency

- Sub-option B21-a
- Sub-option C3
- Sub-option D2
- Sub-option E2
- I would actually support the removal completely of CE, but this is unfortunately not an available option for consideration. This is a GIANT loophole that not only has been

manipulated by the states but has wasted scientific time and board effort. Further, there has been ZERO repercussion for the overharvest of states that have exceeded their CE limitations. Simply this has been used as a tact to harvest bass to the severe detriment of the overall health of the biomass (for specific example, the gross overharvest of the 2015-year class by MD in the Chesapeake bay has been in no way accounted for by that state. This is inexcusable!)

There is a unique opportunity for this management board to correct the sins of its father, so to speak. The state of the striped bass fishery from a triumphant comeback and large abundance to an ever-shrinking population with fewer and fewer opportunities to catch these fantastic animals, can be largely laid at the feet of management. Please do all you possibly can now to rebuild and sustain the population of our wonderful Striped Bass.

Thank you,  
Matt Risser  
610.906.7020

Sent from [Outlook](#)

**From:** [ronald parver](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7 Input - CCA  
**Date:** Tuesday, March 8, 2022 2:00:34 PM

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Please do something to protect our environment and all the animals who need our protection from greed!

**From:** [Aj Brundige](#)  
**To:** [Comments](#)  
**Subject:** [External] Stripped bass!!!  
**Date:** Tuesday, March 8, 2022 1:37:09 PM

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It's not the guy with the rod and reel cause of any problems it's commercial fishing..... While I love the 2021 regs include information circle hooks I think there is a much broader problem. That was set in motion when the army core of engineers blocked and damned striper populations off from huge amounts of spawning habitat. The same for herring and shad. When fish reach a damn and can no longer go upstream they shouldn't have to stack on top of one another for spawning room. I think these are hugely overlooked issues that no one wants to talk about.

Sent from my iPhone

**From:** [bielawski99](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped fish fishing  
**Date:** Tuesday, March 8, 2022 12:33:40 PM

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My opinion after considering the striped bass situation is that the entire east coast fishery should be completely closed for at least 2 years. While that might seem drastic, I think they would need at least that much time to recover, and if not, extend it. Nobody wants to see striped bass driven to extinction!

Thank you,  
David Bielawski

Sent from my Galaxy Tab® S2

**From:** [Stanley J Taylorson Jr.](#)  
**To:** [Comments](#)  
**Subject:** [External] rockfish in the Chesapeake bay  
**Date:** Tuesday, March 8, 2022 12:25:44 PM

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I have fished the Chesapeake bay for more than 60 years. I have seen the population of fish species go up and down. In the fall of the year the schools of big Striped bass was so thick sonar could not read depth through them (and this was after the moratorium). Today there are no schools of large striped bass, Rockfish population has got to be at the lowest point ever. There use to be many different schools of rockfish in the bay. Several schools above the bay bridge and many below the Bay Bridge. Each area of the bay fished the school of fish in front of them. Angler's use to troll with 4 to 6 rods and catch their limit of striped bass with in short period of time. Hopefully someone with some common sense is looking at this. Last year every boat on the entire Chesapeake bay fished one school of fish and followed it through out the summer. There were boats from as far as Solomon's Island fishing in front of Tolchester Beach to fish that one school of fish. All those boats live lining spot last year and the number of undersized fish floating on top the water was sickening. It is ridiculous to wait until 2023 to make a change when we everyone knows there is a problem now. No one should keep a breeder fish for a long time and stricter regulations need to happen now, not 2023. Thank you for this opportunity and hope someone does something soon.

*Jim Taylorson*

Cell 410-977-8378

Stanley.j.taylorson@jci.com

**From:** [DENNIS PRZEKOP](#)  
**To:** [Comments](#)  
**Subject:** [External] KAF Comments on Draft Amendment 7  
**Date:** Tuesday, March 8, 2022 12:13:06 PM

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Dear Ms. Franke,

As a striped bass angler, I support the elimination of all striped Bass commercial fishing as the decline of the Striped Bass population began with the reintroduction of Striped Bass commercial fishing, and something here is very fishy when it constantly refers to the recreational Striper fisherman to more restrictive regulations as the cause and solution to the decline of Stripers when the fact is commercial fishing of Stripers and the interests of corporate profit, I support only the complete elimination of commercial fishing of Stripers and only as this makes 100% sense because commercial fishing is the cause of the Stripers decline, good luck catching any in Long Island Sound, a Commercial fishing wasteland!

Sincerely,

DENNIS PRZEKOP  
25 Pratte Ave  
Taftville, CT 06380  
[dennispz@live.com](mailto:dennispz@live.com)



**From:** [Maine Magic](#)  
**To:** [Comments](#)  
**Subject:** [External] ASGA & FUTURE SSB as of 03/07/2022  
**Date:** Tuesday, March 8, 2022 11:37:44 AM

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Hello, As a woman who does saltwater fish here in Kennebunk, Maine I am leaving a personal message to those in positions of implementing betterment for fishing persons and the catch. Over 30 years of fishing this area, only catch and release, the size of SSB has not improved due to draggers and netters operations. True, they must work to pay the bills and continue to supply their wholesale accounts. Commercial Fishing vs Recreational Fishing is a no-win situation. Supply vs Demand and the almighty dollar have worked tirelessly together, creating a strong unbreachable wall. Amendment 7, as far as I am concerned, is hot air in an already deflated balloon with an unpluggable hole in it. Hindsight in this subject missed the mark long ago. We should improve and require all states to improve. Without improvements, no soul wishing for a quiet day fishing will find that haven. Move forward, past the mistakes, and learn to be flexible.

Cheers from Maine.

MKK

**From:** [spencer.hopkins@comcast.net](mailto:spencer.hopkins@comcast.net)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Tuesday, March 8, 2022 10:35:41 AM

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ASMFC,

Please support amendment 7 using 4.1 Management Triggers Tier 1 thru 4.6.2.

Sincerely,  
Spencer Hopkins

**From:** [Bruce Spiegelman](#)  
**To:** [Comments](#)  
**Subject:** [External] KAF Comments on Draft Amendment 7  
**Date:** Tuesday, March 8, 2022 10:03:07 AM

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Dear Ms. Franke,

I think banning the commercial striped bass fishery is imperative. Commercial fishermen are limited to fish >35", but they kill many more fish to catch the big ones. It is known that ALL stripers over 35" are reproductive females. It is completely insane to preferentially target large breeder fish.

Sincerely,

Bruce Spiegelman  
271 Waban Ave  
Waban, MA 02468  
[bruce\\_spiegelman@dfci.harvard.edu](mailto:bruce_spiegelman@dfci.harvard.edu)

**From:** [Gail & Danny](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment # 7 ASMFC  
**Date:** Monday, March 7, 2022 8:53:33 PM

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I will say this that my believe is that the circle hook is working and the feed back I receive from fellow anglers and license captains is that it has not been in effect for long enough time. I would also like to suggest that a different release be used, release the fish while its in the water,,vs. bringing it to a net or the boat. Thank you for allowing me to comment on the important amendment. Danny M. Conklin.

Sent from [Mail](#) for Windows

**From:** [Chris Vassallo](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com); [Chris Vassallo](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Monday, March 7, 2022 7:44:48 PM

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## **ASMFC:**

I am a Maryland resident and life-long recreational fisherman. I started fishing the Chesapeake Bay in the early 1990s and have seen the Striped Bass fishery rise from the ashes and then crash and burn! I no longer fish for Striped Bass in the Chesapeake Bay and I plan to sell my boat. Frankly, it's not worth the gas money. Additionally, I am tired of being discriminated against for the benefit of the charter boat fleet and commercial fisherman. The stock is dangerously overfished – not by the recreational fisherman who typically release their fish unharmed, but by those who strive to make their living off of a resource that belongs to everyone. Catch and release works for almost every fishery, let's cut the discrimination and allow all fisherman to fish and practice conservative methods. Below are my comments toward the provisions I want the ASMFC to select, and I would like the stock rebuilt as soon as possible.

### **4.6.2 Management Program Equivalency**

**Option B. Restrict the Use of Conservation Equivalency Based on Stock Status – Do away with CE. It only allows states like mine to further deplete stocks.**

**Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals – We need to use the most accurate data sets possible. 30% accuracy is very inaccurate. You wouldn't use 30% accuracy for safety standards or survivability of surgery for your children, using 40 to 50% would be disastrous.**

**Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries – No uncertainty buffer and no CE.**

**Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries – No CE.**

### **4.1 Management Triggers – Don't delay action.**

#### **Tier 1: Fishing Mortality (F) triggers**

**Option A: Timeline to Reduce F to the Target** - Reduce F to a level that is at or below the target within one year.

**Option B: F Threshold Triggers** - If F exceeds the F threshold, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under Option A.

**Option C: F Target Triggers** - If F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, the striped bass management program must be adjusted to reduce F to a level that is at or below the target within the timeframe selected under sub-option A.

## **Tier 2: SSB Triggers**

**Option A: Deadline to Implement a Rebuilding Plan** - Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.

**Option B: SSB Threshold Trigger** - If female SSB falls below the SSB threshold, the striped bass management program must be adjusted to rebuild the biomass to the target level within an established timeframe [not to exceed 10-years].

**Option C: SSB Target Trigger** - If female SSB falls below the target for two consecutive years and the fishing mortality rate exceeds the target in either of those years, the striped bass management program must be adjusted to rebuild the biomass to a level that is at or above the target within an established timeframe [not to exceed 10-years].

## **Tier 3: Recruitment Triggers**

**Option A: Recruitment Trigger Definition** - The recruitment trigger is tripped when any of the four Juvenile Abundance Indices (JAIs) used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA) shows an index value that is below 75% of all values (i.e., below the 25th percentile) in the respective JAI from 1992-2006, which represents a period of high recruitment, for three consecutive years.

**Option B: Management Response to Recruitment Trigger** - If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

**Tier 4: Deferred Management Action** - No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger.

### **4.2.2 Measures to Address Recreational Release Mortality – Where is the language that addresses commercial fisherman? Did you see the video?**

**Sub-option C1** - Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

**Sub-option C2** - Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

**Option D. Outreach and Education – This should include the Coast Guard as well as the MD Sheriff and NRP. Most don't know or understand the regulations.**

**Sub-option D2:** - It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1.

**4.4 Rebuilding Plan – Get it done as soon as possible! It is going to hurt, so make it hurt for everyone!**

**4.4.1 Recruitment Assumption for Rebuilding Calculation** - Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

**4.4.2 Rebuilding Plan Framework** - 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 recruitment assumption specified in Amendment 7) 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.

Chris Vassallo  
Saint Leonard MD

**From:** [Penfield Fishing](#)  
**To:** [Comments](#)  
**Subject:** [External] Release Mortality  
**Date:** Monday, March 7, 2022 4:30:46 PM

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Hi. Thank you all for taking the time to redraft Amendment 7. I recently spent a semester of my senior year of high school researching the effects of release mortality and other issues facing the striped bass population. The result was a website created to further educate recreational anglers on how to properly release striped bass. To you guys, that is not entirely controllable but as evidenced in the redraft of Amendment 7, there are many things that you can control. My suggestion is to look into shifting the slot limit down to a slot between 18 and 24 inches. At this age, bass have not started to breed and more female bass that are in the current slot size will be able to breed and be protected. Many of these 18-24 inch fish are also dying of release mortality because they are more commonly caught than bigger bass. Please consider looking into this as it could help a lot. Thank you for taking the time to read this comment.



**From:** [jb@joshuabergan.com](mailto:jb@joshuabergan.com)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Draft Amendment 7  
**Date:** Monday, March 7, 2022 3:09:22 PM

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I am writing with public comments in regard to Draft Amendment 7 of the Interstate Fishery Management Plan for Atlantic Striped Bass.

**In regards to 4.1 Management Triggers, Tier 1:** I support Sub-options A1, B1, and C1.

**Tier 2:** I support A2, B1, and C1.

**Tier 3:** I support A2 and B2.

**Tier 4:** I support A.

**In regards to 4.2.2 Measures to Address Recreational Release Mortality:** I support Sub-option C1, Sub-option C2, and Sub-option D2:

**In regards to 4.4 Rebuilding Plan:**

**4.4.1:** I support option B.

**4.4.2:** I support option B.

**In regards to 4.6.2 Management Program Equivalency (Conservation Equivalency):** I support Option B1-a, C3, D2, and E2.

If any of this is unclear, please feel free to reach out. Thank you for taking the time to consider our opinions!

Best, Josh

From: [MICHAEL EVERSMIER](#)  
To: [Comments](#)  
Subject: [External] Draft Amendment 7  
Date: Monday, March 7, 2022 9:39:24 AM

---

Hello,

I would like to submit my comments on rebuilding the striped bass populations. I am a recreational fisherman and underwater photographer in Maryland who has enjoyed fishing for and snorkeling with striped bass for over 45 years. I've experienced not fishing for rockfish through the moratorium and we should never allow the numbers of striped bass to get that low again. I have also seen these fish waiting out summer in cooler pockets of water because of high river temperatures in July and August. They need more protections to thrive in the ecosystem for future generations to experience and enjoy.

Here are my suggestions that will require sacrifices from all parties to make this happen. Striped bass need protection from netters and fishers before they spawn, they need more food to stay healthy and grow, and they need relief from fishing pressure when the water is too warm.

I would recommend that states stop issuing and buy back some of the commercial fishing licenses to reduce the commercial harvest. The striped bass is a seasonal, local fish that should be enjoyed in a local restaurant or eaten at a family's diner after being freshly caught. They don't need to be over harvested so they can be consumed year round or shipped beyond their catch area.

Spawning striped bass need more protection in the late winter and spring from harvest and fishing pressure. The only way to rebound the population is with larger and more frequent year classes. You can't protect what is not there.

Striped bass need more reliable food supplies. Stop large scale harvest of menhaden which are a key species in the food web and that also help improve water quality as a filter feeder. More predator fish need more prey species. Large scale menhaden operations can derive their fish oil and protein from invasive fish like silver carp and blue catfish.

Stop recreational fishing during the warm summer months. Two weeks in the summer is not enough, close the season completely from mid July to end of August while the fish are easily stressed. There are other fishing options during this time period. More community education is also important for a fish to be

released safely after being caught. Circle hooks and replacing treble hooks with single hooks can go a long way to helping a fish survive.

The striped bass population is not unlimited, it's population will never be very big because of its place in the food web as a top predator. Both commercial and recreational fishers need to realize this. It is a local fish that should be allowed to thrive in a healthy environment and enjoyed seasonally by people here on the east coast after they have spawned and again in the fall when they can be safely released.

Thank you,  
Michael Eversmier  
mseversmier@verivon.net

**From:** [John Stillwagon, Jr.](#)  
**To:** [Comments](#)  
**Subject:** [External] Comments on Draft Amendment 7  
**Date:** Monday, March 7, 2022 8:48:25 AM

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Dear Ms. Franke,

As a striped bass angler, I support balancing precautionary management with regulatory stability and reasonable access to the fishery. To achieve that, I support the following options.

Management Triggers:

Fishing Mortality Triggers:

Timeline to Reduce F to the Target, I support Sub-option A1 (status quo) 1 year.

F Threshold Trigger, I support Sub-option B1 (status quo) If F exceeds the threshold in a single year, action must occur to reduce F to the target within timeframe selected under sub-option A (supported A1 above).

F Target Trigger, Support Sub-option C1 (status quo) if F exceeds the F target for two consecutive years and female SSB falls below the SSB target in either of those years, must reduce F to a level that is at or below the target within the timeframe selected under sub-option A (supported A1 above).

Spawning Stock Biomass Triggers

Deadline to Implement a Rebuilding Plan, I Sub-Option A2: Two-Year Deadline

SSB Threshold Trigger, I support Sub-option B1 (status quo) Rebuild when SSB in a single year falls below the threshold.

SSB Target Triggers, I support Sub-option C3. No management trigger related to SSB target because F target trigger also has an SSB target component and managers directly control F.

Recruitment Triggers

Recruitment Trigger Definition, I support Sub-option A2: Moderate Sensitivity Recruitment Trigger.

Management Response to Recruitment Trigger, I support a variation of Sub-option B2. The Board use an interim F target calculated using the low recruitment assumption and then during the next stock assessment it evaluates F against the new interim F target and simultaneously evaluates all the other management triggers to determine if action is needed.

Deferred Management Action, I support Option A. No deferred management action. Stock assessments following a management change should be scheduled to enable evaluation of two fishing years under the new management measures providing an opportunity for the population to react to the corrective management action while creating management stability for at least two years.

Measures to Address Recreational Release Mortality

Seasonal closures, I support Sub-options B2 Spawning Area Closures.

Gear restrictions, I support Sub-options C1 and C2.

Outreach and Education, I support Sub-option D1. States are required to promote best striped bass handling and release practices by developing campaigns.

Recruitment Assumption for Rebuilding Calculation, I support Option B. Use a low recruitment assumption for the 2022 stock assessment.

Rebuilding Plan Framework, I support Option B. Enable ASMFC to respond quickly through Board action.

Management Program Equivalency, I support Sub-options B1-A and B1-C, C3, and D1.

Sincerely,

John Stillwagon  
4662 36th St S Apt A  
Arlington, VA 22206  
onthebus36@yahoo.com

**From:** [AquaMan Charters - Capt. Nolan Agner](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Comments  
**Date:** Sunday, March 6, 2022 11:03:44 PM

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I don't have much to offer in the way of comments, but I will share a bit of information. I recently had a conversation with a lifelong Northern Neck, VA mariner. He knows everyone operating in that area and has known most of them since they were young. The subject of the lack of striped bass came up. He expressed to me that many of the gill net fishermen leave their nets out even during the closed season. The season happened to be closed at the time and he said there were nets out there at that moment with just about every hole in the net plugged with a striped bass. He said you could see some of them floating on top full of bass. He said it made no sense and he couldn't understand why some of these people he had known for decades could be so foolish. Idiots like this and the lack of enforcement (patrols who know what to look for) have devastated the middle bay. That's about all I know to say. Another moratorium is the only real answer. And proper management when opened back up. Good luck!



**Capt. Nolan Agner**

AquaMan Sportfishing Charters

757-200-0200

[www.fishaquaman.com](http://www.fishaquaman.com)

[nolan@fishaquaman.com](mailto:nolan@fishaquaman.com)

**From:** [workingfool@va.metrocast.net](mailto:workingfool@va.metrocast.net)  
**To:** [Comments](#)  
**Subject:** [External] Rockfish  
**Date:** Sunday, March 6, 2022 5:50:31 PM

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It is plain and simple, CLOSE the SEASON in ALL states FOR ALL FISH over 32" size LIMIT. These are the BREEDING stock, and you keep letting people take them. When you kill one of them you are killing over 10 million eggs that will never have a chance of growing up. Pull your head out and just use common sense. Omega cannot be blamed when the regulations you propose are that stupid. YEAH, kill all of the big momma's THAT MAKES A LOT OF SENSE. IT does not take a lot to figure this thing out.

Thanks,  
Percy Douglas

**From:** [Luyen Chou](#)  
**To:** [Comments](#)  
**Cc:** [stripercomments@gmail.com](mailto:stripercomments@gmail.com)  
**Subject:** [External] Comments on draft of Amendment 7 to the ASMFC Atlantic Striped Bass Management Plan  
**Date:** Sunday, March 6, 2022 5:19:41 PM

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To the members of the Atlantic States Marine Fisheries Commission:

I am an avid recreational fly fisherman who has fished for striped bass along the New Jersey, New York, Connecticut, Rhode Island, Massachusetts, and Maine coastline for well over three decades. As such, I truly welcome the opportunity to provide my commentary on the proposed Amendment 7 to the ASMFC Atlantic Striped Bass Management Plan. Those of us who have lived long enough to see the precipitous decline in striped bass stocks in the 70s and 80s, the positive impact of sensible fisheries management on stock rebuilding in the 90s and 00s, and the ominous signs yet again of a troubled fishery in recent years have a deep, vested interest in getting Amendment 7 right so that we can all enjoy the bounty of our coastal waters for years to come.

Specifically:

On 4.1 Management Triggers:

- Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality
- Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold
- Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions
- Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality:

- Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method



- Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation:

- Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. I recognize this option may require more restrictive management measures than option A, which I support

On 4.4.2 Rebuilding Plan Framework:

- Option B to allow the Board to take direct management actions as well as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, “Management program equivalency (also known as “conservation equivalency” or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.” I believe in restricting the use of conservation equivalency (CE) based on stock status.

Specifically, I support:

- Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level
- Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates
- Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries
- Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

Thank you for your important work in rebuilding our striped bass stocks.

Luyen Chou  
Brooklyn, New York

**From:** [Hessinger](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, March 4, 2022 9:49:09 PM

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I am recommending that the striped bass regulations for recreational fishermen remain the same as those implemented in 2021.

Barry Hessinger  
1103 4th St.  
Catasauqua PA 18032  
610-972-7383

**From:** [jdsmith@gtel.net](mailto:jdsmith@gtel.net)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Friday, March 4, 2022 4:18:53 PM

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I support widespread conservative efforts to help the Striper population recover to the point it is a healthy sustainable population for ALL to use. However I do not support a complete closure of recreational fishing at any point during the spawning period on the Hudson River.

This would be unduly punitive upon the majority of anglers who are already practicing catch and release in the river. I believe a catch and release fishery for stripers is an effective way to assist recovery of the resource. I am confident there would be widespread support among recreational anglers for a strictly catch and release fishery as opposed to changes to the daily limit/size limits

**From:** [Derek Moore](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, March 4, 2022 2:51:07 PM

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Good afternoon,

My name is Derek, and I am a master's of engineering student at Cornell University as well as a recreational spearfisherman from NJ. I would like to provide the below comments regarding Draft Amendment 7.

It is important that we take strong measures to protect striped bass, which have been subject to overfishing and overfished status. This should include circle hooks and no-targeting closures, such as options B1 and/or B2-b, but not no-harvesting closures. As evidenced from the past 3 years, the greatest cause of mortality is recreational catch-and-release, which has resulted in overfishing and overfished statuses of striped bass. It seems both ineffective and unjust to limit harvesting with additional no-harvest zones/seasons when it seems fishing without intent to harvest is contributing to mortality on a similar order of magnitude.

I have no specific comments on options C & D at this time, but if the evidence is strong that these interventions will improve the health of the stock, then they should be supported. I have reached out to Brendan Harrison and Emile Franke for additional questions, and will provide further comments upon their response if necessary.

Thank you,  
Derek Moore

**From:** [Burl Self](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft amend 7  
**Date:** Friday, March 4, 2022 11:08:33 AM

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I support closing of stripped bass season until stocks recover.

Best

Burl Self Va Beach Va

Sent from [Mail](#) for Windows

**From:** [Bland](#)  
**To:** [Joe Cimino](#); [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, March 4, 2022 10:47:27 AM

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## Section 4.4.2 Measures to Address Recreational Fish Mortality

Mandatory use of circle hooks when fishing with bait was in place for 2021. It was the single regulation put in place to reduce recreational fish mortality. As such it should have a major impact on the assumed value of 9% of the catch. It is one of four listed factors driving mortality. The others are environmental, angler experience, and angler behavior. Since it was decided to target use of circle hooks, I would expect the assumed mortality rate to drop proportionally by at least 2.25% to 6.75%. Maybe more because it was deemed to be really important.

When will the impact of mandatory circle hooks be taken into account in the assumed rate of fish mortality? Because it is an assumption and not backed by proof, reducing the assumed value should not have to wait for MRIP estimates or any other studies. Does the new value need to be documented in this or future addendums before it is actually used? If so it needs to be documented in this addendum.

Craig A. McIlrath  
NJ Recreational Surf Fisherman  
38 Mill Park Lane  
Marlton, NJ 08053  
856-905-1711  
[blandmail@comcast.net](mailto:blandmail@comcast.net)

**From:** [Richard Nardini](#)  
**To:** [Comments](#)  
**Subject:** [External] striped bass  
**Date:** Friday, March 4, 2022 9:44:27 AM

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GAMFISH STATUS ONLY!!!!!!!

**From:** [Nelson Sigelman](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, March 3, 2022 5:40:08 PM

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ASMFC:

I remember when the striped bass minimum size was set at 36 inches and to catch a "keeper" was a notable accomplishment. Fishermen accepted the challenge and the need to keep the bar high for the good of the fishery.

I remember fly fishing along Lobsterville Beach on the island of Martha's Vineyard when hooking into 20 and 30-inch fish was almost a given in the month of June. Those days are gone.

There is no time to waste. Enact a moratorium on the possession of striped bass. Or at the least, return to the 36-inch minimum so more fish have an opportunity to spawn. Recreational fishermen support measures that benefit striped bass.

If politics dictates, allow a small quota commercial take restricted to commercial as opposed to gas-money fishermen.

The charts and formula details in the draft are mind-numbing.

Bottom line: I and many of the recreational fishermen I know urge you to be as conservative as possible, as quickly as possible for the good of the resource.

Thank you.

Nelson Sigelman  
115 Bernard Circle  
Vineyard Haven, Massachusetts 02568

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***[Martha's Vineyard Fish Tales](#): How to catch fish, rake clams, and jig squid, with entertaining tales about the sometimes crazy pursuit of fish***

***[Martha's Vineyard Outdoors, Fishing, Hunting and Avoiding Divorce on a Small Island](#)***

MV Times Review, Jan. 2, 2018, "[Good Sports](#)"

Vineyard Gazette, May 25, 2018, "[Front Row Seat to the Natural World](#)"

[marthasvineyardoutdoors.com](http://marthasvineyardoutdoors.com)



**From:** [George Jehn](#)  
**To:** [Comments](#)  
**Subject:** [External] striped bass hearings  
**Date:** Thursday, March 3, 2022 4:00:37 PM

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Dear Sir or Madam:

As a former editor for the FISHERMAN magazine, I noticed the decline in striped bass fishing BUT ONLY IN CERTAIN AREAS, after Superstorm Sandy hit Long Island. So perhaps the state of the fishery has been incorrectly reported. The fishery has been on the rebound for the past couple of years in many of the areas that were almost devoid of stripers for many years after Sandy, most notably, Montauk.

However, the current New York striped bass size regulations are counterproductive as many bass, especially the larger, female ones die after being (photographed) and released despite the requirement for circle hooks. I urge the institution of anglers being allowed to keep one striped bass 30 inches or over per day, as the current rules only contribute to the needless destruction of the fishery.

Thank you,

George Jehn

**From:** [Tom Fuda](#)  
**To:** [Comments](#); [Justin Davis](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, March 3, 2022 3:02:59 PM

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March 3, 2022

To the Atlantic States Marine Fisheries Commission,

My name is Thomas Fuda. I am a recreational angler residing in the state of Connecticut and fishing primarily from the shoreline of Connecticut for striped bass, bluefish and other species. I am not affiliated with any particular organization or fishing related business. I am writing to express my preferences for the options up for consideration in the Draft Amendment 7 to the Interstate Management Plan for Atlantic Striped Bass. I am strongly in favor of conservative management of striped bass, and I feel the options I prefer are the most conservative options available if the goal is protecting the resource and rebuilding the SSB to target within the 10-year rebuilding timeline. I will break down my preferences by section. My preferences are indicated below in **bold text**.

## Section 4.1: Management Triggers.

### Tier 1 Options: Fishing Mortality Management Triggers

Option A: Timeline to Reduce F to the Target

**Sub-option A1** (status quo).

Option B: F Threshold Triggers

**Sub-option B1** (status quo).

Option C: F Target Triggers

**Sub-option C1** (status quo).

### Tier 2 Options: Female Spawning Stock Biomass Management Triggers

Option A: Deadline to Implement a Rebuilding Plan

**Sub-option A2** (two-year deadline to implement a rebuilding plan).

Option B: SSB Threshold Trigger

**Sub-option B1** (status quo).

Option C: SSB Target Trigger

**Sub-option C2** (SSB falls below target for three consecutive years).

### Tier 3 Options: Recruitment Triggers

Option A: Recruitment Trigger Definition

**Sub-option A2** (any of the four JAIs fall below the 25th percentile of all values in the respective JAI from 1992-2006 for three consecutive years).

Option B: Management Response to Recruitment Trigger

**Sub-option B2** (interim F target is calculated using low recruitment assumption).

### Tier 4 Options: Deferred Management Action

**Option A** (status quo - no deferred management action). I am opposed to any of the other deferred management options, as I feel these may only lead to delaying action when it may be needed to reverse trends that threaten the health of the fishery.

## Section 4.2.2: Measures to Address Recreational Release Mortality

Option A: Addendum VI circle hook measures

**Option A should remain in effect**

Option B: Effort Controls

**Sub-option B2-a** (no-harvest spawning closure required).

**Sub-option B2-b** (no-targeting spawning closure required).

Option C: Additional Gear Restrictions

**Sub-option C1** (only non-lethal devices allow to remove striped bass from the water).

**Sub-option C2** (striped bass caught on unapproved gear or methods must be returned to the water).

Option D: Outreach and Education

**Sub-option D2** (recommend states continue to promote best striped bass handling).

## Section 4.4.1: Recruitment Assumption for Rebuilding Calculation

**Option B** (rebuild SSB to target no later than 2029 using the low recruitment regime assumption).

## Section 4.4.2: Rebuilding Plan Framework

**Option B** (if 2022 stock assessment indicates A7 measures have less than 50% prob. of success and more than a 5% reduction in F is needed, adjust F rebuild through Board action). I favor this option because it allows managers to potentially implement new management measures in the 2023 season, rather than 2024, if following the normal Addendum process called for in option A.

## Section 4.6.2: Management Program Equivalency

Option B: Restrict the Use of Conservation Equivalency Based on Stock Status.

Sub-option B1: Restrictions

**Sub-option B1-a** (restrict use of CE if the stock is overfished).

**Sub-option B1-c** (restrict use of CE if overfishing is occurring).

Sub-option B2: Applicability

**Sub-option B2-b** (sub-option B1 restrictions apply to quota-managed rec. fisheries).

Option C: Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals

**Sub-option C3** (only MRIP estimates with a PSE not exceeding 30% may be used for CE proposals).

Option D: Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries

**Sub-option D2** (CE proposals must include an uncertainty buffer of 25%).

Option E: Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries

**Sub-option E2** (must demonstrate equivalency to the percent reduction/liberalization project at the state-specific level).

Thank you for your ongoing efforts in developing this amendment.

Sincerely,  
Thomas Fuda

**From:** [rfyogibear@aol.com](mailto:rfyogibear@aol.com)  
**To:** [Comments](#)  
**Subject:** [External] stripe bass  
**Date:** Thursday, March 3, 2022 2:15:20 PM

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i would saw keep the quotas and sizes the same for 2022. robert f., massapequa recreational fisherman

**From:** [Matthias Phillips](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Thursday, March 3, 2022 11:56:12 AM

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Dear DEC,

It is my personal opinion that the detriment to the striped bass fishery is not due to the recreational fisherman keeping illegal fish, a larger part is due to gill nets that I see are proficient on the south shore of Long Island, specifically the amount of over slot fish that die of oxygen deprivation and are unable to then contribute to the breeding pool. I have seen personally fish in the 40-50 lb range that wash up dead on the beaches as a result of these, and it is a sad site to see. Please do more to regulate the commercial striped bass fishery, in fact I would say the only way you should be able to fish, even commercially, is with hook and line. Thank you.

Matthias Phillips

Sent from my iPhone

**From:** [Harry Carter](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass Regs  
**Date:** Thursday, March 3, 2022 11:31:42 AM

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Good afternoon, I hope that this email finds you well. I would like to add my input on the recent striped bass regulations. I release almost every striped bass that I catch. I primarily fish Western Long Island Sound and its waters East to Block Island. This past season I have never seen so many large striped bass floating upside down dead in our waters. Those large fish do not revive well after being caught. The years of 36" minimum length for striped bass was probably the best fishing that I have ever seen. I wish that we could go back to those regs. I also think that the season should be opened in May as to let all the breeding females make it up the Hudson. The fisherman that are catching all these large fish, pulling them out of the water, taking pictures have a high mortality rate. I have seen it first hand. The Raitan Bay bite should be closed to all fisherman until after May 8th. Please take my words into consideration.

Thanks for your time.

Capt. Harry C. Carter Jr.

**From:** [Thomas DiGiacomo](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped bass amendment 7  
**Date:** Thursday, March 3, 2022 3:40:55 AM

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Dear Emilie- I have been a fisherman for most of my life. Although every year is different it is apparent that there are fewer striped bass in our waters and large fish are especially scarce. I hope the most conservative measures to protect our striped bass will be passed and the most important fish to the area will be able to expand their range to what they once were. Thank you

Thomas DiGiacomo, P.E.

## **Management Triggers**

### **Tier 1 Mortality Triggers**

Option A1

Option B1

Option C1

### **Tier 2 SSB**

Option A2

Option B1

Option C1

### **Tier 3 Recruitment**

Option A3

Option B2

### **Tier 4**

Option A

## **4.2.2 Recreational Release Mortality**

Option A

Option B1: against

Option B2: against

Option C1

Option C2

Option D1

## **4.4.1 Rebuilding Plan**

Option B

## **4.4.2 Rebuilding Plan Framework**

Option B

## **4.6.2 Management Program Equivalency**

Sub-option B1a

Sub-option B1c

Sub-option B2b

Sub-option C3

Sub-option D3

Sub-option E2



Sent from my iPad

**From:** [Mike Bushey](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Wednesday, March 2, 2022 7:56:25 AM

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I would like my opinions considered during the public comment section of the process of evaluating the future of the striped bass fishery in the Hudson River.

The striped bass season in the Hudson River is an amazing event every year. While we are all concerned with maintaining the population, we also enjoy the sport as it allows many to spend more time on the Hudson than they do any other time of the year.

We have made significant changes over the past few years including changing the slot limits and the requirement of circle hooks. I am not sure the overall impact of those changes has yet to be seen.

I think there are several measures that could be taken instead of the proposed changes in Draft Amendment 7 including increased fines for fishing out of season, taking fish outside of the current size guidelines. If the fine was \$1000 per illegal fish, you would likely see less people willing to violate the regulations. Another idea would be further modifications to the regulations in the lower Hudson and beaches. There are literally fish caught in the Hudson and released that can be caught off the beaches and are considered legal.

Another suggestion would be education. Provide more resources that would teach anglers how to catch and release properly to reduce the number of fish that die as a result of improper catch and release methods. The third suggestion is to take a portion of the season to catch and release ONLY.

The striped bass season has been something my family looks forward to and literally counts down the days to opening day. Between bait, gear, food and gas I estimate that just my family spends \$1500 each year during the season with most of it going toward bait and food at local shops. I am not sure when the last economic impact study was done, but every launch in Rockland, Orange, and Ulster counties is packed with cars each weekend day throughout the season.

Thanks for your time.  
Mike Bushey  
32 Hill Road  
Salisbury Mills, NY 12577  
845-798-9666

**From:** [Timothy Begin](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Monday, February 28, 2022 2:00:21 PM

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Good Afternoon Emilie, please see my comments on the striped bass draft amendment 7 document below.

Thanks,  
Timothy Begin

**Comment:**

**In regards to conservation equivalency, I do not support the status quo option.**

**The option I would support is option B1 specifically sub option B1-a**

**From:** [Michael Moriarty](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Sunday, February 27, 2022 8:00:28 PM

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I have been a Nj fisherman as long back as I can remember, even when I was just a kid. I'm 64 years old and I am telling you that there is nothing wrong with a our striped bass population around here in Jersey. If even for a minute you think there is a shortage of striped bass around here in Jersey, then you have not been fishing at all. I abide by all fishing regulations and there is plenty of striped bass for all of us boaters and surf fishermen. I think we have all done our part over the past years and fishing for striped bass has never been better.

Mike M

Sent from my iPhone

From: [William Johnson](#)  
To: [Comments](#)  
Subject: [External] Draft Amendment 7  
Date: Sunday, February 27, 2022 3:59:42 PM

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Dear Atlantic States Marine Fisheries Commission

First, thank you for addressing the plight of the striped bass on the Atlantic Coast. It contains many thoughtful recommendations. I have only two comments.

1. Unless I have missed something, I suspect that you may be using outdated and flawed data when estimating the mortality of released fish. When these data play such a major role in policy decisions, we should have the best data possible. We may need to commission new, more comprehensive studies ASAP on fish caught by a variety of methods.

While the older studies may apply to fish caught using live or dead bait, I suspect that there is lower mortality from fish caught trolling and certainly to fish caught via light tackle jigging. This method of fishing is growing steadily.

You might also require that ALL hooks used by both recreational fisherman and by commercial hook-and-line fishermen be barbless.

2. I live in Maryland. In the past, Maryland has submitted its own approach to meeting your management goals. I hope that you will approve the Maryland plans only after critical consideration. In the past Maryland has allowed two practices that seem to contradict the policies outlined in ASMFC Amendment 7 and that adversely affect the fishery.

a. Maryland DNR encourages the continuation of its spring "Trophy Season" in the Chesapeake that specifically targets the largest fish on their spawning migration, without even a slot limit. If we want more baby rockfish, why do we target the mamas? This season is supposed to only target the post spawn fish, but removing the biggest fish in the population seems odd. I can see no possible biological justification for this practice.

b. Maryland has allowed persons on party or charter boats to harvest two fish apiece. This is a direct violation of your limit to one fish per person. Why is this allowed?

The ASMFC is our only way to protect the resource from questionable policies proposed by individual states that can be influenced by local

financial and political interests as is the case in Maryland

Thank you for your consideration.

William Johnson  
Parkton, MD 21120

**From:** [Jack Keating](#)  
**To:** [Comments](#)  
**Subject:** [External] Comment on Striped Bass Population  
**Date:** Sunday, February 27, 2022 10:50:38 AM

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I fish out of Cape May, NJ and would like to make a suggestion that will help to preserve some of the population in our area and maybe in other areas also.

When I return from fishing it is common place to hear other fishermen bragging about their catch and casually stating that they caught their fish beyond the 3 miles and took their chances bringing them into shore. The most common statement to be made following those statements is that it is not very likely that they will get fined because no one hardly ever stops returning boats coming from outside waterways.

If periodically, staffing would permit, it would be a great deterrent to have checks at the 3 mile line and fine violators to the max. If that were done off and on during the summer and a little more increasingly during migration word would get out and it would certainly slow illegal harvesting.

I anticipate that your first inclination will be that the above will not save too many fish from harvest. Trust me. It is a much more commonplace than you think in Cape May. I am almost 79 and am around the docks and bait shops a lot and you would not believe how many fish in Federal waters most of the time.

Hopefully, you will consider this problem to be more prevalent than it has been in the past. Cape May can't be the only place this is happening along the east coast.

I should also note that SIZE MATTERS to these guys so many, many cows are taken rather than being released to propagate.

Thanks in advance for any consideration you may be able to give to this problem.

**From:** [daniel keyser](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment 7  
**Date:** Sunday, February 27, 2022 9:48:18 AM

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To whom it may concern,

In regards to the proposed draft in which fishing for striped bass in the Hudson River, either completely or for 2 weeks during the peak spawn I find this as absurd. There are always closures for the recreational fisherman who are supporting local business by buying rods reels tackle and so on. There has been data shown that the Hudson River population is not in trouble. Meanwhile in the ocean you are allowed to keep more stripers and different size limits. I understand you don't want to take all the spawning fish out of the run, but in my opinion 1 fish of any size would eliminate people releasing fish that could die and go to waste fir the turtles or eagles. I also don't see anything that would address the commercial catch of striped bass which would more than likely out number any recreational catch in many areas. It seems that the recreational fisherman are always getting the shaft. With the herring Atlantic Marine Fisheries either had the use of herring be prohibited or a limit of 10 per person, but was there anything to address the commercial fisherman who take whole schools of thousands of fish, no there wasn't.

I would suggest that this draft is not adopted and maybe the commercial fishing is finally addressed, but I'm sure it won't and us recreational fisherman will get the shaft yet again.

Thank you

Daniel keyser  
Sent from my iPhone



**From:** [Keith Piskorski](#)  
**To:** [Comments](#)  
**Subject:** [External] MANAGMENT PLAN  
**Date:** Saturday, February 26, 2022 8:29:37 PM

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THIS PLAN WORKED WELL FOR THE LAST SEASON 2021 AND THE AMENDMENT FOR 2022 SHOULD REMAIN THE SAME. I NEAVER SEEN AS MUCH BUNKER IB THE RARITAN BAY AS I SEEN LAST YEAR , AND THE STRIPED BASS FISHING WAS INCREDIBLE. I HAVE FISHED THIS AREA FOR 50 PLUS YEARS AND IT'S THE BEST I HAVE SEEN.  
THANK YOU  
KEITH PISKORSKI  
SOUTH AMBOY, NJ

**From:** [Dave B.](#)  
**To:** [Comments](#)  
**Subject:** [External]  
**Date:** Saturday, February 26, 2022 1:40:13 PM

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STRIPPED BASS ARE PLENTYFULL ! THEY ARE ALL OVER NORTH EAST COASTS ,

I FISH NY/NJ/ ROCKAWAY / NJ HIGHLANDS, CONEY ISL, TO JONES INLET AREAS , BASS ARE MORE THAN PLENTYFULL HERE. RELEASED FISH LIKELY TO DIE AND ALTHOUGH ILEGAL, MANY BIG FISH ARE BEING KEPT AND NOT RELEASED ANYWAY BY MANY PEOPLE, I SEE NO SHORTAGE OF STIPPED BASS TO HAVE A SIZE RESTRICTION ON THEM ANY MORE . WOULD LIKE TO SEE IT GO BACK TO WHAT IT WAS BEFORE, ANY THING OVER 28 IN CAN BE KEPT, AND 1 FISH FER ANGLER.

**From:** [takethelead@comcast.net](mailto:takethelead@comcast.net)  
**To:** [Comments](#)  
**Subject:** [External] striped bass regulations  
**Date:** Friday, February 25, 2022 11:46:01 AM

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We read all of the magazines and news articles relating to striped bass (rockfish) being overfished.

We are boat owners and also enjoy catching the species.

We believe strongly that all people engaged should have a valid license and follow the rules, as we do.

Three areas need to be addressed in the Chesapeake Bay (and elsewhere).

#### 1. Dead Discards

"Solution": Extend the closed weeks from the existing two, to three or even four, for the very hottest days in July and August. Alternatively, as an emergency measure, allow DNR to post an emergency closure of the season past the two-week moratorium, based on actual weather patterns, water temperature, and dissolved oxygen levels. In the Bay this extended moratorium could be regionalized. As a possible exception for Charter Boat Operators during these emergencies, they could continue to operate, but with reduced creel limits or an increase in minimum size for keepers.

#### 2. Increase Penalties

"Solution": Significantly raise the penalty for exceeding catch limit, undersized fish, and fishing without a license. For licensed individuals, suspend their license for the current year, future year, etc. based on criteria of severity of the infraction.

#### 3. Automatic Incarceration and Fines for Blatant Disregard of Our Laws

"Solution": Unlicensed individuals caught catching large quantities of striped bass, typically undersized, should be taken to the local jail and heavy fines imposed. They should not be released until the fines are satisfied after their hearing. Paying these fines shall include seizure of personal property that can be sold to satisfy the penalty, if they are not able to pay. Currently, these people are caught, cited, and fish seized; penalties ignored. Based on reported articles, a majority of these individuals are non-US citizens from 3<sup>rd</sup> world countries. A message needs to be sent to their community that as a bare minimum, they must respect our laws and regulations.

**From:** [Curtis Hall](#)  
**To:** [Comments](#)  
**Subject:** [External] Rockfish regulations  
**Date:** Wednesday, February 23, 2022 12:18:45 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)

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I know new management practices are being considered for striped bass / rockfish. As an avid sportsman, I offer my perspective on the fishery. I grew up on the Chesapeake Bay and still live on the water in Kent Island, MD. I have fished these waters since I was 13 and had my first boat ( a 13' boston whaler). I am now 56. I have lived through the cycles good and bad and the moratorium. The moratorium was a huge success, but I hope we never have to go there again. Many migratory fish species have been managed successfully with slots limits. I feel strongly that this is a viable solution for this fishery. An 18" to 28" slot would allow fish to get to a harvest size minimum (18") and protect the mature breeding stock over 28". These are really the best fish for eating anyway. We have to stop killing big fish!!!! Stop the spring trophy season. No fish over 28" to be kept EVER. Many light tackle charter captains get this and encourage anglers to release big fish and even offer discounts off a future trip for releasing big fish. Many anglers get it. The fishery is in big trouble. This measure could hurt some charter businesses in the short term, but a future moratorium would hurt worse and have a devastating affect on the economy.  
Thanks for listening. Respectfully submitted.

**Curtis Hall**

VP/GM, Asphalt

**ALLAN MYERS**

O: 610.222.3183

M: 610.587.2543

W: [allanmyers.com](http://allanmyers.com)



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**From:** [cnplanners@optonline.net](mailto:cnplanners@optonline.net)  
**To:** [Comments](#)  
**Subject:** [External] Re: Draft Addendum  
**Date:** Wednesday, February 23, 2022 6:28:58 AM

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To Whom It May Concern;

In the second paragraph on the below email I mentioned circle hooks as a gear prohibition. That was in error. I wanted to say treble hooks.

Thank you,  
Timothy Anfuso

----- Original Message -----

From: [cnplanners@optonline.net](mailto:cnplanners@optonline.net)  
To: [comments@asmfc.org](mailto:comments@asmfc.org)  
Sent: Tuesday, February 22, 2022 11:21 AM  
Subject: Draft Addendum

To Whom It May Concern;

The state of the striped bass fishery along the Atlantic coast is not uniform. Figure No. 1 Juvenile Abundance shows two different stories between the New York and Chesapeake stocks. Striped bass fishing in the Raritan Bay has been excellent. The Raritan Bay and associated riverine system contains a healthy resident stock. This is because the Hudson is not the only breeding stock. For those in the know, striped bass spawn in the Raritan, Shrewsbury and Navesink Rivers also. I realize that increased effort controls measures are coming and justified in the Chesapeake. However, I do not believe that further closures are warranted the Raritan. If increased area closures are implemented, I believe they should be implemented based on spawning stock areas (Chesapeake, Kennebec, Delaware and New York) and not coastwide. If effort control closures are expanded, such closures should be a no target closure and not a no harvest closure. It makes no sense to retain a catch and release closure and continue to experience the catch and release live discard mortality rate.

In respect to gear restrictions, a new circle hook requirement was instituted for bait in 2021. I believe its to early to determine if further gear restrictions are warranted. additional data is needed. With that being said, I have no objections to prohibiting the use of circle hooks.

I was surprised that no commercial gear restriction discussion was explored in the Draft Amendment. The commercial sector uses gill nets,

pound nets, haul, seins and trawls. All with extremely high discard mortality rates. Some up 90%. With todays technological advancements, I find it hard to believe that no advancement in commercial gear has evolved and the continuation of high mortality century old techniques are acceptable.

Thank you for your time and consideration.

Timothy Anfuso

50 Society Hill Way

Tinton Falls, NJ 07724

From: [Timothy Begin](#)  
 To: [Comments](#)  
 Subject: [External] Draft Amendment 7  
 Date: Tuesday, February 22, 2022 11:19:44 PM

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Good Evening Emilie, please see my comments on the striped bass draft amendment 7 document below.

Thanks,  
 Timothy Begin

Comment #	Section	Comment
1	1.1.1.1 Management Triggers	<p>There is a statement made in this section – “The shorter timetables for corrective action are also in conflict with the desire for management stability.” –</p> <p>I find this statement to be problematic in two ways:</p> <ol style="list-style-type: none"> <li>1.) Stock health should be more important than the stability of the management regime. If rapid action is required to protect the stock it should be taken.</li> <li>2.) Rapid changes in management regimes for other species of game such as deer, waterfowl, elk are made all the time by fish and game agencies based on year to year fluctuations in populations and hunters are able to respond and follow the rules. I don’t see why anglers would be any different.</li> </ol>
2	1.1.1.1 Management Triggers	<p>There is a statement made in this section – “Furthermore, the use of point estimates in decision-making does not account for an inherent level of uncertainty.”</p> <p>It would be good if the commission can explain why the management framework cannot account for uncertainty. It would make sense that if uncertainty can be quantified then the management framework could be based on the most conservative end of the uncertainty range there by providing some level of safety margin to the system.</p>
3	1.1.1.2 Recreational Release Mortality	<p>In this section the commission states that the striped bass fishery is a predominantly catch and release fishery. The section goes on to essentially infer that unless rec release mortality can be addressed harvest mortality reductions will have a deminimus effect on the stock.</p> <p>As a recreational angler I wonder why the stock cannot be managed as a catch and release fishery? The commission openly</p>

		<p>admits the fishery is predominantly catch and release, this has worked for many other species and moratoriums on harvest have worked in the past for striped bass. It seems to me that an implementation of harvest moratoriums would be a good first step in rebuilding the stock and further measures could be enacted if the stock is still trending downward.</p> <p>This path would represent the will of the vast majority of the fishery participants. The current management framework seems to over prioritize the wishes of the commercial striped bass industry which is a small minority of fishery participants.</p>
<b>4</b>	Tier 4 Options: Deferred Management Action	<p>The deferred management action framework of management triggers should be removed from the document. Some could reasonably argue that the current framework of management triggers has not been followed and that action on the obviously overfished and declining stock has already been delayed.</p> <p>The deferred management action framework is not acceptable in my mind and in the minds of most of the fishery participants.</p>
<b>5</b>	4.2.2 Measures to Address Recreational Release Mortality	<p>The following is stated in this section: “If management action is taken to influence where mortality (harvest vs. discard) is coming from, managers must consider the impacts those actions will have on the fishery. For example, management measures focusing on reducing recreational releases could discourage participation from anglers that value food fish and negatively impact industries that cater to those anglers”</p> <p>Two comments:</p> <ol style="list-style-type: none"> <li>1.) Again, this makes up a small majority of the fishery participants but under the current management regime they seem to be given outsized considerations.</li> <li>2.) People who value striped bass as food fish have many other options to move to if striped bass harvest is closed. In truth they have many other better options. Catch and release anglers do not have the same luxury especially those who participate in the fishery from shore.</li> </ol>
<b>6</b>	4.2.2 Measures to Address Recreational Release Mortality – (option B	<p>As a first step in management, I do not support no targeting closures. The first step should be no harvest closures and we should see how the stock is affected.</p> <p>As a second step I only support no targeting closures in very specific instances such as pre and post spawn and in areas where high water temps can drastically increase post release mortality. I</p>



	effort controls)	<p>also think if no targeting closures are considered, the commission should have to present clear data that the closure is warranted.</p> <p>I'm also concerned about the efficacy of any effort control measures because enforcement of the measures would seem to be very difficult if not impossible. Anglers could just claim they are fishing for other species.</p>
<b>7</b>	4.3	<p>See comments 3 and 5 – I believe we are at the point where the stock should be managed as a catch and release fishery and commercial quotas should be zero.</p> <p>The commission states in this document multiple times that the SSB is low, yet we are allowing commercial angler to take fish over 35 inches. This does not make sense. If we want to rebuild the stock, we need large female fish remain in the stock.</p>
<b>8</b>	4.4.1 Recruitment Assumption for Rebuilding Calculation	<p>This section makes the following statement: "Several years of poor recruitment may indicate the stock is entering a low recruitment regime..."</p> <p>has the commission explored reasons for this? It appears the commission is asserting that this low recruitment is predominantly a natural occurrence and that humans have no role to play in it and therefore out of their control.</p> <p>Recommended action for the commission: explore/study causes of low recruitment; remedy if possible.</p>
<b>9</b>	Final comment general statement on management	<p>I do not believe the current management structure approaches the issues related to the striped bass stock in the most effective or efficient manner.</p> <p>If we approach this problem from a balance point of view the rate of change in striped bass stock is equivalent to the difference between the fish entering the system (spawning and recruitment) and the fish removed from the system (mortality in all forms).</p> <p>This document focuses heavily on reducing the mortality of striped bass – reducing the removals from the system, but really in no way addresses the other side of the equation - fish entering the system. The document states low recruitment and poor spawning as problems but provides no substantive measures to improve recruitment or improve spawning.</p> <p>We cannot solve the problems with striped bass without remedying the problems causing low recruitment and poor spawning.</p>

		<p>We need to be looking at environmental factors affecting spawning results, we need to be looking at habitat loss and degradation, we need to stop killing the large females that are so important to spawning success and we need to understand the dynamics of low recruitment vs high recruitment regimes.</p> <p>We have to focus on both sides of this equation, not just the mortality side, if we're going to rebuild striped bass.</p>

**From:** [Wgr6633931](#)  
**To:** [Comments](#)  
**Cc:** [Jessica Best](#); [Wgr6633931](#)  
**Subject:** [External] FMP Comments - Attn.: Emilie Franke  
**Date:** Tuesday, February 22, 2022 6:49:43 PM

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2/22/22

To: Emilie Franke

Ms. Jessica Best, Fisheries Biologist with the NYSDEC and the administrator of their Hudson River Estuary/Logbook Program, brought the FMP to the attention of myself and the other Program participants.

I fish (shore) only for carp and channel catfish - catch & release - using corn and bread/dough baits. The catfish take these carp baits as readily as the carp. Stripers don't.

The striped bass are a much valued fish, and I see a lot of Hudson boat and shoreline pursuit of them April-May. Stripper fishermen may need some adjustment to a partial closure. Their comments - and those from tackle shops - might be particularly informative.

Relevant to striper conservation some of my experience may be useful,

- I always use inline circle hooks for the carp and catfish - Eagle Claw L7228 & Gamakatsu 221411 (both models are "tournament approved")
- I use a finer-mesh, pre-moistened landing net
- If I weigh the fish, I use a pre-moistened weigh-sling to hold the fish horizontally -- attach the scale to the sling, not to the fish -- just subtract the sling weight.

Also, on-site and in-store education may be useful. Sporting goods/tackle shops/yacht clubs/charter boats/pier sites/fishing clubs may well be cooperative -maybe Agency-supplied posters?.

I've seen the wardens drop around to one of the fishing piers to check marine registrations and fishing licenses - maybe hooks too? - combine education and enforcement -- with heavier enforcement when called for.

Thank you for your attention.

William Greene

**From:** [Steve](#)  
**To:** [Comments](#)  
**Subject:** [External] Stripers NJ  
**Date:** Monday, February 21, 2022 1:26:31 PM

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*Hi , As a recreational fishermen in NJ, I see first hand that the Striped Bass Fishery is in great shape. They are practically caught at will during the spring and fall seasons and in certain areas of our state, they are caught all through the summer. I also think the measures that were imposed two years ago have met the needed reductions and that the 2022 bench stock assessment will likely show this.*

Thanks Steve Lienhardt

**From:** [Peter Kellison](#)  
**To:** [Comments](#)  
**Subject:** [External] NJ Striper regs  
**Date:** Saturday, February 19, 2022 8:54:45 PM

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As an avid New Jersey fisherperson I feel that the population of Stripers off our coast the last three years has been exceptional. With Stripers being present through out the year. I feel that since we have the slot limit, use in line circle hooks, and there is no commercial harvest in our waters we shouldn't have any changes to our regulations. The Chesapeake population has problems where we don't. New Jersey shouldn't suffer for another state's bad managment. Why not stop the commercial harvest of Stripers or ban net fishing. Beach and Gill nets should be banned. New Jersey has suffered enough. We have made sacrifices for years. Now we finally get to be rewarded for our diligence. Please don't take it away.

Peter J. Kellison

**From:** [Paul N. Bozek](#)  
**To:** [Comments](#)  
**Subject:** [External] amendment 7  
**Date:** Saturday, February 19, 2022 9:29:45 AM

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I am opposed;  
To any closures.

I would be in favor of;

1. 1 fish per week, which is impossible to regulate, therefore catch and release only.
2. Limiting to 2 fishing rods per person
3. Limiting to 5 fishing rods per boat
4. No treble hooks
5. Limit trolling rods to 2
6. Require a trolling boat to stop when a fish is hooked up. No dragging the fish while retrieving.
7. Circle hooks certainly help. Impose a minimum hook size would help more. Certainly reducing juvenile mortality.
8. Educate fisherman on appropriate equipment and handling.
  - a. Use of heaver line/leader to retrieve fish quickly and return to the water unstressed, give up the light line challenge.
  - b. Take pictures quickly and return fish quickly.
  - c. Encourage downriggers rather than long-lines when trolling to reduce the stress on the fish.
  - d. Offer fishing seminars, in person and virtual, on-line instructional video's emphasizing the importance of "conservation".
  - e. Use the "marine registry" to contact fisherman and provide guidelines, techniques, recommendations, ramifications if we don't all do diligence.
  - f. Provide hand-out literature, posters advertising seminars, videos etc. to tackle / bait shops.
  - g. Contact sportsman's associations offering information as mentioned above.

I Live in New York, fishing the Hudson River. I belong to 2 sportsmen's clubs. The Hudson Valley has associations called "Federations of Sportsman's Clubs". They are by County. Most clubs belong to these federations. These federations meet monthly with a delegate from each club attending. They offer reports and information to the delegates. Utilizing their resources would provide extensive exposure for the asmfc, an inexpensive means of communicating conservation techniques to the fishing community.

Feel free to contact me if you find any of my thoughts useful.  
Thank you for the opportunity to assist.

Contact info

Paul Bozek

[pnbozek@frontiernet.net](mailto:pnbozek@frontiernet.net)

please do not sell or publish my email information to others

Sent from [Mail](#) for Windows 10

**From:** [Paul Mulholland](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft Amendment 7  
**Date:** Friday, February 18, 2022 12:50:28 PM

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Hello,

As a NJ-based recreational fisherman, I am concerned about the future of the Striped Bass Fishery. Fishing for stripers this past year was fantastic, however this was expected due to the unusually high recruitment in 2016. The declining female SSB since the early 2000s is worrisome, and I would fully support more restrictive measures, or even drastic measures such as a moratorium, if it would benefit the longevity of the fishery.

Furthermore, I'm concerned about the effectiveness of in-line circle hooks to reduce dead discards. While I used only circle hooks last year, my gut-hook ratio was no less than in previous years. I'm new to circle hooks and I wasn't sure when to set the hook to reduce gut hooks. More public education on how to properly use circle hooks is needed to ensure the circle hook program reduces dead discards.

Thank you,  
Paul Mulholland



**From:** [bill](#)  
**To:** [Comments](#)  
**Subject:** [External] Draft amendment 7  
**Date:** Wednesday, February 16, 2022 7:40:30 PM

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Stopping the fishing for striped bass in the hudson river is crazy unless you shut down the whole east coast and commercial industry. The bass are only in the river for just over a month and anglers slaughter the bass in the ocean the rest of the year. The fish we let go they keep and never get to spawn again. You did not give enough time for new regs to work but the fishing has improved in size and amount of fish since regs were changed. We can only keep under 28" fish. You would kill the bait shops charter boats and marinas on or near the hudson. I JUST BOUGHT A NEW BOAT LAST YEAR. I would have no use for it if not for fishing stripers. I see way more floating bass in the ocean than the river Im 60 and have been fishing since 16 for them and have owned boats since the 80s for the river. Please consider this when making your decision. Bill walsh montgomery ny

**From:** [Jason Williams](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass PID  
**Date:** Wednesday, February 16, 2022 2:24:58 PM

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Hello, I'd like to give preference between the 2 choices on recreational fishing of the Hudson River for migratory striped bass in the 2022 season. Between the two choices on the table I would select closing fishing during peak spawn rather than a complete closure this close to the normal season opener. I am not a charter fisherman but I am in contact with many who have already booked their seasons. A drastic change this late would certainly create a large financial blow to these people. The mandated use of hooks in addition to closing the peak spawn and perhaps the post spawn to protect the fishery appears to be a viable option. Hopefully, that would give those who have invested resources in the sport, during an already severely weakened economy, the opportunity to soften the blow and plan for future impacts while at the same time insulating the bulk reproducing fish from mortality. I am sure it would be greatly appreciated and even fairly well received if our fisherman had notice that actions taken this season were a step toward a possible total closure in the season to come.

Thank you for your time and the opportunity to voice an opinion in this matter which is very near and dear to the hearts of so many.

Jason Williams

Sent from my iPhone

**From:** [Jason Ivino](#)  
**To:** [Comments](#)  
**Subject:** [External] (Subject: Draft Amendment 7)  
**Date:** Wednesday, February 16, 2022 2:01:46 PM

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Why is it every time it's the guys that play by the rules and release fish get punished when you have charter boats running 3 trips a day keeping whatever they want for the clients commercial fishing around the mouth of the Hudson River but yet you want to once again add more rules to recreational fishing in our river how about option C catch and release only and no charter boats last 2 weeks

**From:** [Lance Sperl](#)  
**To:** [Comments](#)  
**Subject:** [External] Hudson River Striper Seaso  
**Date:** Wednesday, February 16, 2022 1:30:20 PM

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Hello,

My name is Lance Sperl. I have been fishing stripers for the last 20 years on the Hudso. River. My response to this ridiculous thought process is quick and simple.

Why are you always blaming the little guy (residential fishers) for the failures and corruption of the commercial fishermen?

This is complete nonsense and will effect so many of the little people financially.

Stop the insanity and leave us every day folks alone.

**From:** [Kevin Krause](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped bass PID  
**Date:** Wednesday, February 16, 2022 12:17:49 PM

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Closing the striped bass season on the Hudson River would be devastating to all of us that fish it. They already have a slot limit, and circle hook mandate, I think try these regulations for a couple years and see what happens. The regulations should be for the huge boats in the ocean that drag net these fish. A person catching a few striped bass doesn't compare to thousands caught in a net... most of us fisherman in the Hudson are sport fisherman, not keeping any fish...it is crazy to stop people from fishing with rod and reel when the netting is the real problem. Also has a study been done on all the seals off cape cod? Thousands of them on monomoy Island, how many bass does it take to feed them,??? We are only able to fish about 4 to 6 weeks up here in the Coeymans area,I really hope to continue fishing here for many years...

**From:** [jbsr40@gmail.com](mailto:jbsr40@gmail.com)  
**To:** [Comments](#)  
**Subject:** [External] Striped bass pod  
**Date:** Wednesday, February 16, 2022 5:06:00 AM

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Sent from my iPhone I am concerned about the closure of complete shutdown of the Hudson River for stripers. Mainly troll for them. In the many years fishing there. We only get a few Over the 28 inch slot. Shutting it down completely would hurt us that troll and catches the ones inside the slot limit. keep it open and put restrictions on the live lining . Stop the guys that r taking the breeders out of the water to take pictures . Have them release still in water. There r a lot of guys that charter on there also. Will impact them greatly. Please do not shut the fishing down completely

**From:** [Ed Skorupski](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bas PID  
**Date:** Tuesday, February 15, 2022 10:44:07 AM

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Regarding Amendment 7 of the Striped Bass Mgt., Plan – I am in opposition to the proposed closings as put forth in Sub-option B2 as they would apply to the Hudson River.

For Upper Hudson striper anglers, the season is, in reality 2-3 weeks in length and any closure would effectively result in “no” striper season – this is unfair to the anglers and would have a detrimental effect on local businesses that provide services to the anglers – marinas, bait shops, cafes, fuels,.....

DEC YOY studies show a 15% annual increase of YOY over the last 5 years – which is not coincidental with the implementation of the “slot” limit – why not let the Hudson River data speak – Don’t penalize the anglers who have/are doing the right things.

Respectfully

Ed Skorupski  
1329 Hudson Ave  
Stillwater, NY 12170

518 664-5866

**From:** [Gael](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass PID  
**Date:** Monday, February 14, 2022 11:57:31 PM

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To whom it may concern:

Regarding Striped Bass management options being considered in the Hudson River:

Any closure of striped bass fishing in the Hudson River would be a terrible blow for recreation on this great waterway. For decades the federal and state government have combined forces to clean up pollution to create a healthier river and ecosystem. It has been amazing to watch the newfound enjoyment of this great resource especially during the striped bass run in the spring. To witness people boating and fishing on the river is a testament to the efforts of the last few decades, and to take the only few weeks of enjoyable fishing away from these sportsmen would be a setback for those same efforts. As a sportsman who respects the striped bass and their great migration I would recommend a license system which requires training in the safe handling and revival methods for safe release of these amazing fish. There is no greater satisfaction than landing a trophy Striper and watching that giant tail fin swim vibrantly back into the depths of the river. My family and any guest on my boat knows the importance of a long revival and recovery of a large fish but all too often that is lost on the inexperienced. Education should be the mission of the management plan of the future of this fishery. We've worked too hard for a clean Hudson River to have this enjoyment removed from the region.

Thank you  
Gael Appler  
Milton NY

Sent from my iPhone



**From:** [scott rager](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass PID  
**Date:** Monday, February 14, 2022 2:05:42 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Howdy Ms. Franke,

I fish for Stripers up to the Troy dam on the Hudson.

The possible spawning area closures would drastically impact the sportsman's activity on this part of the Hudson.

All folks that I know who fish this area are using the circle hooks and are quite familiar with the handling of the fish for successful release.

Rules currently in place are allowing the large females to spawn, while at least offering the angler an opportunity to harvest a smaller, most likely male, fish for consumption.

Please reject the implementation of the proposed spawning area closures for the Hudson River.

Respectfully,



Scott A. Rager  
82 Hunter Ln.  
Queensbury, NY 12804  
h. 518-798-3143  
c. 518-796-0789  
rager@roadrunner.com



Nonsolis Radios Sediouis Fulmina Mitto

Sic Vis Pacem Para Bellum

**From:** [George Murphy](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped Bass season in the Hudson river  
**Date:** Monday, February 14, 2022 12:26:39 PM

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Cap ,George Murphy here again, In my first letter regarding any closures of the Hudson River I talked about my history on the Hudson and my opinion on the subject.

Now last year we all had to use circle hooks and that is a big problem with bait fishing for cold spring fishing because the fish really don't just hit the bait and run.like they do in the ocean. Now you people are talking about possibly closing the season in the river or closing it for two weeks or catch and release only ? Where is the data on the mortality of these fish.I'm out there every day during the striped bass run and I've never I mean never seen anybody from any agency scoop up or count a single floating bass,and to be honest I rarely see dead bass on the surface.

Now in my humble opinion the bass population is rebounding just fine .We are getting more big fish each year here in the river great runs up and down the Jersey shore all the way through December .You want to take away my livelihood<I'm retired now and the month of MayI'm very busy.>. The Hudson river is already a catch and release fishery .you can't keep anything over 28 inches and you almost never see big breadder bass dead on the water,<the eagles wont carry away a30lb bass.

If more conservation is in order perhaps we should do away with some of the techniques that are questionable .

Last year we had a big spawn happen in Saugerties I witnessed boats armed with downriggers dragging plugs through the schools of fish.That is not "fair chase"and should be outlawed.

Those fish are not eatingI dropped a live herring in the area to see what would happen ,there not feeding. but then again no dec could be found to inforce the pre-existing laws or looking for dead fish for a census.<the event was blowing up on social media the whole fishing community new about it.

Perhaps we could cut down on commercial harvest and make it a true game fish.  
than you for your time .

George Murphy  
845-532-1555

[www.hudsonrivercharter.com](http://www.hudsonrivercharter.com)

**From:** [George Murphy](#)  
**To:** [Comments](#)  
**Subject:** [External] Fwd: striped bass ,Hudson river closure  
**Date:** Monday, February 14, 2022 11:29:13 AM

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----- Forwarded message -----

**From:** **George Murphy** <[ttkcatskill@gmail.com](mailto:ttkcatskill@gmail.com)>  
**Date:** Mon, Feb 14, 2022 at 11:26 AM  
**Subject:** Fwd: striped bass ,Hudson river closure  
**To:** George Murphy <[ttkcatskill@gmail.com](mailto:ttkcatskill@gmail.com)>

----- Forwarded message -----

**From:** **George Murphy** <[ttkcatskill@gmail.com](mailto:ttkcatskill@gmail.com)>  
**Date:** Sat, Feb 12, 2022 at 11:23 AM  
**Subject:** striped bass ,Hudson river closure  
**To:** <[comments@asmfc.com](mailto:comments@asmfc.com)>

My name is George Murphy and I am an active captain fishing on the hudson river .I've had a captains licence for 16 years I,'ve been fishing on the Hudson for about 30 years.I've already seen a dramatic change in our fishery in the last 5 years because of the creel size changes that were implemented . All the changes in national regulations for striped bass up and down the east coast I support and agree with.I believe that all those big 25 year old bass should be returned to the water to continue there thousand mile journey every year.

That being said ,I am very opposed to a full closure of the Hudson river for two weeks .in an area. Nobody can predict where these fish are going to spawn.Last year they spawned in great numbers in saugerties.the year before it was Poughkeepsie.

Lets not over manage our great resource you folks are doing an ok job now .keep the season open let me earn a living!

Cap George Murphy  
[www.hudsonrivercharter.com](http://www.hudsonrivercharter.com)  
845-532-1555

**From:** [Capt. Jimmy Samia](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped bass PID  
**Date:** Monday, February 14, 2022 8:38:50 AM

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Please do not shut our striper season down. We have a slot limit with adult fish being released unharmed. It is rare to see a floating dead fish in the river. We are there fishing near everyday from the last week of April through the end of the spawn. All the anglers I see are doing a good job of releasing fish unharmed. Stopping the commercial netters would do much more to decreasing striper mortality both in adult fish taken and by catch mortality of smaller stripers caught in the nets.

**From:** [bobbrz@frontiernet.net](mailto:bobbrz@frontiernet.net)  
**To:** [Comments](#)  
**Cc:** [Jessica Best](#)  
**Subject:** [External] Striped bass draft Amendment 7 open for public comment  
**Date:** Sunday, February 13, 2022 12:42:02 PM

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I would ask you to consider not closing down the Striped bass fishing in the Hudson river. In the last few years a number of restrictions have been put in place that should help immensely with the bass population. I don't know if enough data has been gathered in this short period of time to determine if these measures alone may be sufficient. Therefore I would suggest either pausing the proposed drastic actions, or perhaps taking a slower approach by adopting some additional measures that are less restrictive.

Here are some suggestions:

- Eliminating the use of treble hooks all together
- Limiting each angler to only one or two rods (vs 3)
- Allow anglers that participate in the Hudson River Cooperative Angler program to fish throughout the season; allowing for continual data collection
- Adopt a more stringent slot size for Marine waters south of George Washington bridge (vs the 28"-35" currently in place)

Thanks in advance for your consideration.

Sincerely,  
Robert Brzozowski

**From:** [Stephen Dittenhoefer](#)  
**To:** [Comments](#)  
**Subject:** [External] Fishing Hudson during spawn  
**Date:** Saturday, February 12, 2022 12:26:36 PM

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I have been fishing the river for over twenty five years and I agree the fish need a break as more fishing pressure from electronics tracking schools , social media posting locations of schools, to the number of fishermen. That lack of control from enough is enough you catch 15 fish that's enough don't need to catch 50 and take pictures of every single fish it's out of control. This pressure can not be healthy for the population . Limit it to one pole per fishermen that certainly would reduce the catch . I'm sure Many believe it's their right to catch as many as they want but it's just wrong! Steve

Sent from my iPhone

**From:** [Herringhead28](#)  
**To:** [Comments](#)  
**Subject:** [External]  
**Date:** Friday, February 11, 2022 11:08:12 PM

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I do not support Sub-Option B2 Amendment 7 which would close stiped bass fishing in the Hudson River for any length of time. The use of inline circle hook regulations has made a substantial increase in the survival of released fish. The circle hook regulations combined with a new catch and release only regulation will be sufficient methods of maintaining a positive increase in the striped bass spawning numbers in the Hudson River.

**From:** [Maresco, Frank G CIV](#)  
**To:** [Comments](#)  
**Subject:** [External] Amendment (7)  
**Date:** Friday, February 11, 2022 1:47:23 PM

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I DO not support Sub-option B2 Amendment (7) that may close STRIPED BASS fishing for any length of time in the HUDSON RIVER.

Frank G. Maresco  
Frank.Maresco@Westpoint.edu  
Information Technology Specialist  
Dept of Mathematical Sciences  
Bldg 601 (Thayer Hall)  
USMA, West Point, N.Y. 10996-1905  
845.938.3175  
914.213.0572



**From:** [T.S](#)  
**To:** [Comments](#)  
**Subject:** [External] Protecting the fish for the future  
**Date:** Friday, February 11, 2022 10:30:10 AM

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I happen to be a cooperative fishing person & remember 40+ yrs. ago when I was introduced to the great enjoyment of fishing for stripers . Among other fish I enjoying fishing for I recall while living in the Adirondacks & fishing near a powerhouse / dam / a legal notice was up One was not allowed to fish within a certain Distance from where Walleye's were spawning & between a certain date & a certain date that area was closed to allow for spawning . I myself have always been a Catch & release fisherman of the Hudson River & the ocean & streams to a certain degree as well. I have heard stories of people taking all no matter size ?? & one wonder's why things become limited or in some cases where are they? Game wardens have a large ground to cover and things do go unseen I am sure of this . I see no problem with doing what is needed to in hance the continuing efforts to help the Stripe Bass Survive & flourish. if it means Zoning off areas of no fishing during spawning so, be it !

If it means closing up large location to make sure we are doing our best to make sure they continue to survive & to bring smiles to those whom have never caught one, when season and areas are open. At times One's have to sacrifice, in order to have .

I DO HOPE MY MESSAGE MAKES SENSE I AM 62 AND LORD ONLY KNOWS HOW MANY MORE YRS I HAVE TO DO WHAT I LIKE & THAT IS FISHING & ENJOYING THE GREAT OUTDOORS. I WANT MY GRANDKIDS TO ENJOY IT AS WELL!

I PERSONAL SAY DO WHAT YOU GOT TO DO SO WE HAVE & SO GENERATIONS AHEAD HAVE AS WELL !

BEST OF LUCK!

CJ SHENE Jr

**From:** [lov2fish@optonline.net](mailto:lov2fish@optonline.net)  
**To:** [Comments](#)  
**Subject:** [External] Amendment 7  
**Date:** Tuesday, February 8, 2022 5:14:51 PM

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I'd like to comment on the striped bass Amendment 7

I have been striped bass fishing for the past 35 years I have quite a bit of experiance

I feel your 9% mortality is way off, more like 2% at most especially with the circle hook laws. On a very busy day in Rairitan Bay during the striped bass migration there would be hundreds of dead bass floating all over which i have yet to ever see! I would love to know how they came up with 9% ???

I Release over 1,000 striped bass a year and they all swim away just fine. None floating, after release, and i'm positive they don't swim away just fine, then die and fall to bottom. These fish are very hearty.

Furthermore, catch and release should be allowed in Bays and Rivers all year Even during closed season. Many people enjoy fishing in the winter when most have put their boats away and crowds are down. This also would help tackle shops that struggle during the off season. Is catching and releasing them in December and March when it's legal, compared to the few caught January and Febuary, going to make a bit of difference to the fish populations, I doubt it!

Some might claim catch and release during winter will stress them to not breed/spawn Once again I doubt it since I have caught the same fish, 15 minutes later ( can tell by 1/2 missing tail ) that release didn't even stress it not to eat 15 minutes later, little enough spawn months later.

Thank You

Mark Strober

Clifton, NJ

**From:** [Spiegelman, Bruce](#)  
**To:** [Comments](#)  
**Cc:** [Jeff Saunders](#); [Steven Koppel](#); [Bob Wiesel](#); [Chris Dudzik](#); [Kajimura, Shingo \(HMFP - HMFP - Medicine\)](#)  
**Subject:** [External] Comments on public striped bass document  
**Date:** Monday, February 7, 2022 4:53:07 PM

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Hi, I am a biomedical scientist and an avid striped bass fisherman. I am very concerned about the commercial striped bass fishery. As you know, stripers are sexually dimorphic and essentially all bass over about 33" are female. Thus, having commercial fishermen focused on bass over 35" is **precisely the most destructive idea to the striper population: they are focused on harvesting only large, reproductively competent females!** So, while you have data about harvest and incidental deaths through commercial fishing, these effects are **grossly amplified** by the effects of killing large females. Since, because of this, the commercial fishery is so destructive in terms of future fry, I strongly urge study of this aspect of striper biology and the closing of commercial fishing or more severely limiting it for several years. I am happy to discuss this further. Best, Bruce

Bruce M. Spiegelman, Ph.D.

Stanley J. Korsmeyer Professor of Cell Biology and Medicine  
Dana-Farber Cancer Institute and Harvard Medical School

**From:** [Charlie Church](#)  
**To:** [Comments](#)  
**Subject:** [External] Striper Amendment 7  
**Date:** Monday, February 7, 2022 10:32:15 AM

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Glad to see we are recognizing the decreasing striped bass stock and are setting a goal to rebuild it.

My comment is to not forget that the stocks have been rebuilt before. We have the perfect case study to use. I think it's important to lean on the conservation side while trying to rebuild the stocks.

Look at the amount of Virginia charter boats fishing in the winter for Striped Bass now compared to the 2000s. I'm nearly positive it's 5% of what it was, maybe even less. Keep that in mind when people who run charters for Striper complain about their business. Plenty are already out of business because of a poor stock.

Thanks,  
Charlie Church

**From:** [Jared Makowski](#)  
**To:** [Comments](#)  
**Cc:** [finchriver@gmail.com](mailto:finchriver@gmail.com)  
**Subject:** [External] Moratorium  
**Date:** Saturday, February 5, 2022 8:31:47 PM

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Hi Emily and friends. Im writing to help protect the Striped bass. Its sad that because of over harvesting and poor regulations, such a wonderful species is on the verge of extinction. It is your job to protect this species and you need to stand up and do the right thing. We need catch and release regulations and we need to stop killing striped bass for profit. As a lifelong angler Im disgusted by how this amazing gamefish is treated by recreational and commercial fisherman out to make a profit. These captains are worse than the guests at Epstein Island. Please consider Stripers Forever's call for a 10 year Moratorium. Thank you and God bless  
-Jared Makowski

**From:** [Vetcraft Sportfishing](#)  
**To:** [Comments](#)  
**Subject:** [External] striped bass PID  
**Date:** Friday, February 4, 2022 5:23:00 PM

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I think one of the most important aspects for rebuilding and maintaining the striped bass fishery is to give better protection for the spawning fish. I understand that some states do not have spawning areas delineated, but fishing managers of those states should be tasked with establishing those parameters.

Still there are additional problems:

No protection for prespawning fish staging upstream of closed spawning areas  
Commercial harvest allowed on staging fish

The decline of the striped bass fishery was obvious even prior to recent ammendments in the Delaware Bay where I have fished for the last 41 years. When the stock was healthy in the early 1990's the stock was well dispursed as the fish entered the bay on their prespawning run. As the stock started to decline the fish became fewer in number and more concentrated as the years went on. By around 2010 most of the recreational fleet fished just inside the legal line as the fish concentrated due to the nature of the funneling anatomy of the Delaware Bay. Many gravid females were harvested by heavy pressure from the recreational fleet. Additionally, the commercial Delaware striped bass fishery harvested 100% of their quota on the prespawning run of the fish.

In order for the stock to rebuild, and to hopefully improve spawning success (I am aware of other factors involved) we need to better protect the spawning stock. I would suggest three solutions:

1. Catch and release only on the spring run of stripers in all producer areas, timing of which should coincide with the arrival of gravid females.,
2. Commercial catch of striped bass should only be allowed on post spawn fish
3. Task states with stablishing "fish courts" where violators can be prosecuted for violations since our court system is to overwhelmed to handle such cases.

Failure to protect spawning aggregations has been shown to be of great detriment in many marine species (even conch are protected during their spawn)

Captain Harvey Yenkinson

Capt Harv  
Vetcraft Sportfishing  
Cape May, New Jersey  
Call or Text 610-742-3891  
Email: [vecraft@aol.com](mailto:vecraft@aol.com)  
[www.vecraftsportfishing.com](http://www.vecraftsportfishing.com)

**From:** [Brook Gabel](#)  
**To:** [Comments](#)  
**Subject:** [External] Striped bass  
**Date:** Friday, February 4, 2022 9:36:25 AM

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The striped bass population needs to be managed to increase stocks for all age classes along with habitat and forage fish. A healthy ecosystem benefits all not just the special interest groups that profit off striped bass on a short sighted approach.

[Sent from Yahoo Mail for iPhone](#)

From: [David Costello](#)  
Sent: Monday, April 11, 2022 11:13 AM  
To: [Comments](#)  
Cc: [Michael Armstrong](#); [Dan Mckiernan](#);  
[sarahpeake@gmail.com](#);  
[ray@capecodfisherman.org](#); [LOWELL WHITNEY](#);  
[stripercomments@gmail.com](#)  
Subject: [External] Striped Bass Amendment, 7  
Attachments: PastedGraphic-1.tiff

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Categories: Auto Replied

Hello folks, thank you for what you do to best manage the striped bass fishery, one of the true treasures of the Bay State and a foundation to what makes Massachusetts a center for conservation and outdoor recreation. I write today in support of your thoughtful conservation efforts for this beautiful species. My thoughts are as follows:

#### 4.1 Management Triggers

The Board MUST react swiftly to triggers to ensure the health of the population. Needless delay leads to further fish mortality and a declining fishery. By reducing fishing mortality to the target within one year, we would be reducing the number of fish removed from the system until that rate is at or below the target.

#### Threshold Triggers

I Support Sub-option B1 (status quo)

#### Deadline to Implement a Rebuilding Plan

I Support Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped. This is a very important facet of Amendment 7 because striped bass were declared overfished in 2018—nearly three years ago—and no rebuilding plan has yet been established. If this option is accepted, Massachusetts can avoid this occurring in the future.

#### Deferred Management Action



I Support Option A (status quo): No Deferred Management Action. If any (or all) of the management triggers are tripped following a benchmark stock assessment or assessment update, the Board is required to respond to that trigger regardless of when the last management action was implemented in response to any management trigger. There needs to be a sense of urgency here.

## Education

I support Sub-option D2: It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns. States should provide updates on public education and outreach efforts in annual state compliance reports. Best practices could include those listed in sub-option D1. An educated public will appreciate the resource.

We should be honest about the situation with striped bass. If we want to rebuild the stock, we must recognize that this needs to be done under a low recruitment assumption. Therefore, ASGA supports Option B.

## Option B. Restrict the Use of Conservation Equivalency Based on Stock Status

Support Sub-option B1-a: CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level. THIS IS CRITICAL!

Thank you again for what you do - David

David Costello  
Principal  
Rising Tide Associates  
C 617 875 2492  
W 617 932 7376  
E [david@risingtidemhd.com](mailto:david@risingtidemhd.com)

From: [Rick Drew](#)  
Sent: Friday, April 8, 2022 12:15 PM  
To: [Comments](#)  
Subject: [External] Public Comment Amendment VII  
Attachments: McGraw-Striped-Bass-Report-FINAL.pdf

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Follow Up Flag: Follow up  
Flag Status: Flagged

Dear Sir/Madam,

As a lifetime striped bass angler and former commercial fisherman, I am deeply troubled by the current state of the Atlantic Striped Bass fishery. We worked very hard to help the species recover during the 1980's and 1990's only to lose most of our progress listening to selfish interest groups that were only interested in the immediate benefit of greater take and relaxed conservation guidelines in recent years. Clearly, that was a HUGE MISTAKE. The current depleted state of the Striped Bass fishery is irrefutable.

We now find ourselves once again fighting to save the iconic striped bass. Many of the same bad actors would like to continue to drive the species to the bottom with further poor conservation practices. We cannot let that happen. At this time, anything other than the more conservative paths forward to stock rebuilding should be rejected as clearly efforts by special interests to high jack this invaluable resource that is enjoyed by anglers up and down the east coast (AKA Striper Coast). In the process, responsible striped bass fishing generating billions of dollars in economic opportunity for our regional coastal communities. Please refer to the attached McGraw study for details on Striped Bass economics.

In addition to the huge economic benefit from a healthy Striped Bass stock, there is extensive scientific data and historical records that support the journey of striped bass reproduction, growth and harvest. As far back as the 1940's it was clear to early US Fish and Wildlife biologists that conservation measures needed to be applied in a consistent manner up and down the coast to be effective. No one state or user group should be considered special.

I have attached a reference document on Striped Bass that supports this historic reference.

Please see the attached historical striped bass document:

Pg 59 - First documented effort to assess Striped Bass mortality.

Pgs 62-63 - Recommendations - Protect Striped Bass to a common length up and down the coast.

I am greatly appreciative of the work put forth on this effort to date and respectfully remind the council that they have played a BIG part in the current downward trend in Striped Bass stocks and this is too bad. Therefore, the only responsible thing to do is vigorously help rebuild Striped Bass stocks and plan for a sustainable path forward. My specific comments on amendment VII are found below. I am available anytime to review, please call me.

Please see below and attached.

 [StripedBassReport.pdf](#)

Thank you and best regards,

Rick Drew  
2 Powder Hill Lane  
East Hampton, NY 11937  
Cell: 631-903-0751

On 4.1 Management Triggers, we support:

- Tier 1: options A1, B1 and C1 to maintain the current thresholds and required actions related to striped bass mortality
- Tier 2: options A2, B1 and C1 to ensure timely management action in the case spawning stocks (SSB) falls below the threshold
- Tier 3: options A2 and B2 to set meaningful thresholds for juvenile stock health, and require measurable actions
- Tier 4: option A to maintain the current requirement that immediate management action be taken - rather than deferred - when management triggers are tripped

On 4.2.2 Measures to Address Recreational Release Mortality, we support:

- Options C1 and C2 to restrict the use of lethal devices (e.g. gaffs) to remove striped bass from the water and to require the release of any striped bass caught by any unapproved method
- Option D2 to promote education and outreach to inform the angling public about striped bass handling and release practices

On 4.4.1 Recruitment Assumptions for Rebuilding Calculation, we support:

- Option B to use the more realistic and conservative low recruitment regime assumptions to rebuild female SSB target levels no later than 2029. We recognize this option may require more restrictive management measures than option A, which we support

On 4.4.2 Rebuilding Plan Framework, we support:

- Option B to allow the Board to take direct management actions as well as require public input, if the upcoming 2022 striped bass stock assessment update shows a less than 50% probability of rebuilding the stock by 2029

On 4.6.2 Management Program Equivalency, per the Draft Amendment 7, “Management program equivalency (also known as “conservation equivalency” or CE) refers to actions taken by a state which differ from the specific requirements of the FMP, but which achieve the same quantified level of conservation for the resource under management.”

We believe in restricting the use of conservation equivalency (CE) based on stock status. Specifically, we support:

- Option B1-a, which would prohibit CE programs until stock biomass is above the threshold level

- Option C3, which would prohibit CE proposals from using error-prone Marine Recreational Information Program estimates
- Option D2, which would require an uncertainty buffer of 25% for proposed CE programs for non-quota-managed fisheries
- Option E2, which would require CE programs to demonstrate equivalency to the Fisheries Management Program (FMP) standard at the state-specific rather than merely coastwide level

Thank you for providing the opportunity to comment on Amendment 7. I look forward to learning the outcome of the upcoming stock assessment and to reading the final version of the Amendment.

From: [Esrich Gmail](#)  
Sent: Wednesday, March 23, 2022 4:54 PM  
To: [Comments](#)  
Subject: [External] Striped Bass management input

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Categories: Auto Replied

I am completely in favor of a total moratorium effective immediately. I don't feel it needs to be 10 years, 5 would do it. The last time it was imposed, there were Bass everywhere at the end. I was an eye witness to this unprecedented resurgence of the population. Stop wasting time and resources with stop gap measures that do not work! I just hope its not already too late.

The following fisheries have almost completely collapsed:  
Delaware Bay, in-shore Southern New Jersey, in-shore Virginia and North Carolina.

The only viable fishery left in the mid-Atlantic comes from the "Hudson river" strain. Still good fishing in Raritan Bay south to Barnegat inlet. In the spring and fall these fish get pounded relentlessly by thousands upon thousands of fisherman day after day. Its common practice for boats to limit out, return to port, off load the fish and go back out for another limit. This is a prime reason "band aide" measures and limits are ineffective.

Until you implement a full moratorium, Bass populations will continue to decline.

I am also in favor of the following measures:

- \* Smaller "over" size limit.
- \* Outlaw snag and drop treble hook fishing. (Mortality issue).
- \* Mandate all hooks to be barb less. ( We have had wonderful release success simply by crimping down the barb. (Mortality issue).
- \* Mandate all fish stay in the water when being released. (Mortality issue).
- \* Outlaw all gaffs. (Mortality issue)

\* Outlaw all multiple hook trolling lures. Multiple fish get hooked simultaneously and are dragged by the boat to their death. Ridiculous!!! (Mortality issue).

\* Outlaw light tackle that cannot land a fish quickly. (Mortality issue).

Thank you  
Bill Esrich

From: \_\_\_\_\_  
Sent: Wednesday, March 9, 2022 9:09 AM  
To: [Comments](#)  
Subject: [External] Draft Amendment 7

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Follow Up Flag: Follow up  
Flag Status: Flagged

Categories: Auto Replied

Asking for the submission of comment is to remain anonymous including email address and name:

As a shore fisherman I'd like to ask the council to consider a motion for creation of fair separation (sub-division) in the recreation sector between "Party Boats and Charters", "Private boats" and "Shore Anglers", where shore anglers represent a minority group of catches and release mortality and should not be penalized for impact on fishery done by other group.

Counsel is recommended to review statistics and percentages inside the recreation sector for validation of such requests.

Proposal is to create a minority group of shore anglers that would get impacted on the last case bases by future reduction or moratoriums based on an honest percentage base and their minimal impact to the stock, if so confirmed.

This should help discriminating against people from various demographics sectors who can not afford boats and fees for commercial party boards and charters and not make them responsible by damage done by others.

Respectfully,

Shore Angler at Long Island, NY