

## OFFICE OF THE COMMISSIONER

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**MAY 17 2016**

Mr. Robert Beal  
Executive Director  
Atlantic States Marine Fisheries Commission  
Suite 201  
800 North State Street  
Dover, DE 19901

Mr. John Bullard  
Northeast Regional Administrator  
NOAA Fisheries  
1315 East-West Highway  
Silver Spring, MD 20910

Dear Gentlemen:

I am writing today to urge you to reconsider Atlantic States Marine Fisheries Commission's (ASMFC) management strategy for black sea bass in the Northern region which includes the five states of New Jersey, New York, Connecticut, Rhode Island and Massachusetts. According to ASMFC's own stock assessment, the black sea bass population was sufficiently rebuilt as of 2009. Since that time, harvest has become more difficult to control despite increasingly restrictive regulations. Seven years later, anglers and related businesses continue to struggle under low catch limits and restrictive measures while black sea bass appear to be more abundant than in any time in recent history. We have seen catches soar around the region which is indicative of a greater fish population.

The time is overdue to implement sensible and fair regulations that are applied equitably across the Region. The increasingly restrictive measures demanded of Northeastern states are inequitable and cause great socioeconomic harm to our anglers and related businesses. This has placed States in an increasingly adversarial position with a fishing public who has lost faith in the management process.



Department of  
Environmental  
Conservation

Please consider the following correction measures:

- Expedite the new stock assessment for black sea bass and any resulting management actions;
- In the interim, modify the current management actions and implement equitable regulations;
- Revise the Mid-Atlantic Fishery Management Council's overly restrictive risk policy to allow for a full assessment of current fishery conditions;
- Develop a true regional approach to management, with consistent regulations across the Region, implemented over multiple years as appropriate; and
- Reconsider how the Marine Recreational Information Program (MRIP) survey estimates are used for management purposes. For black sea bass as well as other species, these estimates simply do not have the level of precision on which to base definitive policy decisions.

The fishing public has conveyed frustration over recent black sea bass management decisions and we hope to work with you to alleviate such concerns. I look forward to partnering with you to improve fishery management and restore faith in the system--providing fair and equitable regulations while maintaining protection of our natural resources.

I appreciate your attention to this matter.

Sincerely,



Basil Seggos  
Acting Commissioner