



April 9, 2021

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 the Public Information Document for 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 developing a comprehensive Amendment 7 for Atlantic striped bass that is responsible to the resource and its fisheries, we submit the following comments on the Public Information Document.

1. Fishery Goals and Objectives – the current goals and objectives from Amendment 6 (outlined in the [PID](#)) provide a strong foundation for striped bass management. We make the following recommendations for consideration to help improve upon the existing goals and objectives.

Recommendations:

- Achieve the conservation goals while still allowing sustainable fishing access.
- Balance the needs of catch and release anglers with anglers who like to take a fish home.
- Stabilize the fishery with regulatory consistency across space and time.

2. Biological Reference Points (BRPs) – we support the current BRPs because they are adequate to achieve the current fishery goals and objectives especially considering that under these BRPs, the population was healthy in the mid-2000s. Further, as the PID highlights, model-based alternatives are not yet available for management use, providing additional support for using the current empirically based reference points. If alternative BRPs are considered in Amendment 7, we request that the Technical Committee conducts an analysis of any proposed alternatives so that stakeholders understand

the tradeoffs as they relate to the current BRPs and the healthy fishery and population achieved in the mid-2000s.

3. Management Triggers – We support management triggers as a great precautionary concept, but the metrics that we use to measure population status (e.g., F, SSB), and the underlying data used to produce those estimates, are highly variable as noted in the PID. This means that a management trigger could be tripped before the population has a chance to react to a previous corrective management action caused specifically by variability in the underlying data.

Recommendations:

- Finding a balance between being precautionary to ensure a healthy population while also maintaining stability in the fishery is the sweet spot for management triggers.
- All management triggers explored should be back tested to ensure that the conditions of a specific trigger will not be met so frequently that it causes regulatory instability.

4. Stock Rebuilding Target and Schedule – We understand fisheries science is not an exact science and [Figure 1 in the PID](#) shows how changes in data and modeling can substantially impact our understanding of the population and its BRPs. The most critical component of the fisheries management program for striped bass is to maintain F at the target level. However, F is not the only factor influencing the ability of striped bass to rebuild. History tells us that recruitment is important to rebuilding the population, and currently recruitment trends are down even when SSB was high (e.g., in the mid 2000s'). Therefore, other factors that we tend to have less control over (e.g., habitat and water quality) play a significant role in recruitment and the ability of SSB to rebuild and we encourage ASMFC to work to actively address those factors to the extent possible.

Recommendations:

- Establish a ten-year rebuilding plan that focuses on maintaining F at its target level
- To the extent possible, formally support improvements to habitat and water quality for striped bass.
- Allow for flexibility in the rebuilding timeline only if F has been maintained at its target level and the Technical Committee determines that factors other than F have contributed to a slow recovery of striped bass.

5 & 6. Regional Management and Conservation Equivalency – we have combined our recommendations on these topics because they both focus on management flexibility. Scientifically, management flexibility will add uncertainty at a time when we need to be maximizing our chance of achieving conservation goals while minimizing risk to the population. We understand that a coastwide science and management structure does not adequately account for the dynamics of a multi stock population and the availability of fish across the management unit (Maine to North Carolina). However, it is prudent to match our management approach with the resolution of the data that we have, especially for data sources where uncertainty is high. The current use of conservation equivalency for striped bass is not working because uncertainty in the underlying data used to justify these programs has resulted in the fishery frequently exceeding its F target. With a coastwide management structure, some states may incur more of the conservation burden, but that is because the availability of fish to those states is higher. Rebuilding the striped bass population will take many sacrifices, but hopefully with the

establishment of coastwide and Chesapeake Bay wide measures ASMFC can find regulations that maintain F consistently at its target.

Recommendations:

- Continue scientific exploration of a multi-stock model to improve understanding of population dynamics.
- Hold off on the implementation of regional management until a multi stock model has been approved for management use and the population shows signs of recovery.
- Restrict the use of conservation equivalency when the population is in a poor condition even if the states agree to state specific accountability because the variability in the catch data will create significant challenges to using it for annual accountability of conservation equivalency programs.
- Implement coastwide and Chesapeake Bay wide regulations for regulatory consistency and stability.
- Find regulations that consistently maintain F at its target. Hopefully, we are close to those long-term measures with the recent changes in Addendum VI.

7. Recreational Release Mortality – 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. However, this is nothing new in this fishery and [Figure 4 in the PID](#) shows that the proportion of fish released alive has been stable and high for decades. The sportfishing industry has focused on education and outreach campaigns to make anglers aware of techniques that can be used to increase the survivability of released striped bass. As stated in issue 1, all anglers play a role in helping rebuild striped bass.

Recommendations:

- In addition to the use of circle hooks when fishing with natural baits, we support the exploration of other common sense regulatory approaches for addressing release mortality.
- Continue to focus on education and outreach to address recreational release mortality.
- Make grant funding widely available to help bolster education and outreach on best handling practices for the benefit of all species not just striped bass.

8. Recreational Accountability – While perhaps not the intent of ASMFC, the term “recreational accountability” inappropriately suggests that challenges with recreational fisheries management are caused by recreational anglers being “unaccountable.” In reality, anglers abide by the regulations and monitoring systems established by fisheries managers. Problems related to ensuring recreational landings are in accordance with conservation goals are generally due to limitations with catch survey designs and/or improper regulations; neither of which are the fault of recreational anglers. The uncertainty of recreational catch data creates significant challenges to fisheries science and management. Because of the variability in catch, a recreational harvest limit (RHL) approach, as is used in federal fisheries, is not a workable solution for achieving the goals and objectives of the striped bass fishery. The RHL approach will lead to management instability and will potentially cause drastic annual changes to regulations, likely attributed to data uncertainty rather than legitimate resource concerns. As evidence of the challenges with the RHL approach, AMSFC and the Mid Atlantic Fishery Management Council are jointly working on a recreational reform framework for federally managed fisheries with an overarching goal of addressing the current RHL approach’s limitations in providing stability, flexibility, and accessibility in the fishery.

Recommendations:

- The subject of this section should be changed from “recreational accountability” to a more appropriate and less offensive term such as “achieving recreational harvest targets.”
- Current limitations of recreational catch data make it difficult to measure accountability using an RHL on an annual basis.
- Use stock assessments that occur over 2–3-year intervals to assess changes to recreational catch and its impact on the population.
- Improve recreational catch data collection using electronic reporting and other programs supplemental to the Marine Recreational Information Program.

9. Coastal Commercial Quota Allocation – The [PID](#) explains that the commercial fishery has recently underperformed its quota because striped bass have not been available to be caught. That is further indication of the resource being in need of conservation.

Recommendation:

- Conservation efforts should be shared equally between the recreational and commercial sectors because everyone who uses the resource has a shared interest in its future.

10. Other Issues – The amendment needs to explore opportunities to enhance habitat to increase the likelihood of spawning success as mentioned in issue 4.

Thank you for the opportunity to comment.

Sincerely,

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