



January 13, 2023

Emilie Franke
ASMFC Fishery Management Plan Coordinator
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 regarding Draft Addendum 1 to Amendment 7 to the Atlantic Striped Bass Interstate Fishery Management Plan. We oppose allowing commercial quota transfers and urge the Board to support Option A (status quo).

The Atlantic Striped Bass Fishery Management Plan (FMP) has never allowed commercial quota transfers between jurisdictions. As the addendum highlights, the Board previously considered allowing commercial quota transfers in Amendment 5 (1995) and Amendment 6 (2014). However, the Technical Committee raised concerns that commercial quota transfers had the potential to increase removals at a time when the resource needed further conservation to achieve FMP goals and population rebuilding.

The 2022 Atlantic Striped Bass Stock Assessment update concluded the population is still overfished, but not experiencing overfishing with a relatively high probability of achieving rebuilding if fishing mortality is maintained at its current level. The rebuilding projections operate under the assumption that commercial quota utilization will remain unchanged, and the allowance of quota transfers would violate that assumption, jeopardizing rebuilding confidence. Although the Technical Committee was not tasked to formally comment on this proposed action, their previous concerns still stand considering the resource is overfished and maintaining fishing mortality at current levels is paramount to achieving the FMP's 2029 rebuilding deadline.

We realize that to ensure the health and abundance of Atlantic striped bass in the future, immediate and difficult management decisions must be made. The long-term health of the striped bass population is our top priority, and the recreational fishing community has made many sacrifices to ensure successful rebuilding. Therefore, we do not support allowing commercial quota transfers at this time because that will increase commercial removals and jeopardize rebuilding this valuable iconic public resource.

Sincerely,

Michael Waine
Atlantic Fisheries Policy Director
American Sportfishing Association

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

Jeff Angers
President
Center for Sportfishing Policy

John Gans
Northeast Field Representative
Theodore Roosevelt Conservation Partnership

Ted Venker
Conservation Director
Coastal Conservation Association