



March 22, 2021

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

RE: Striped Bass Public Information Document (PID) for Amendment 7

Dear Ms. Franke,

Founded by anglers in 1973,¹ *Wild Oceans* is the nation's oldest conservation group dedicated to marine fishery resources. Our organization was heavily involved in the successful recovery of striped bass along the Atlantic seaboard, working with the Atlantic States Marine Fisheries Commission as far back as 1978.

When the 2019 Atlantic striped bass stock assessment concluded that striped bass are once again overfished,² we urged the Atlantic Striped Bass Management Board to initiate a rebuilding program that does not exceed 10 years, as required by Amendment 6 to the Atlantic Striped Bass Interstate Fishery Management Plan (ISFMP).³ It has been nearly two years since the release of the stock assessment, and the Board has yet to take up the issue of developing a rebuilding plan. **The Board's most pressing priority should be restoring striped bass stocks to healthy levels.** A rebuilding plan that will restore striped bass to the target biomass by 2029 should either be incorporated in Amendment 7 or initiated through an addendum action at the spring 2021 meeting.

Other issues identified in the Amendment 7 Public Information Document (PID) can contribute to a successful rebuilding effort and can set the stage for a vibrant future of sustainable recreational and commercial fishing opportunities. Below we provide our recommendations.

¹ As the National Coalition for Marine Conservation (NCMC)

² 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. Available from: <https://www.nefsc.noaa.gov/publications/crd/crd1908/>

³ See Section 2.6 (Stock Rebuilding Program) in Amendment 6.

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Issue 1: Fishery Goals and Objectives

Wild Oceans believes that the existing ISFMP goal and supporting objectives remain relevant to effective management of Atlantic striped bass, and we recommend that this issue be excluded from the scope of Amendment 7. We stress the importance of the first two objectives. Maintaining female spawning stock biomass at the target level helps to ensure a broad age structure that is necessary for long-term reproductive success.⁴

Issue 2: Biological Reference Points

The current biological reference points are appropriate for achieving the ISFMP's goal and objectives, and this issue should be removed from further consideration in Amendment 7. The reference points are designed to guard against recruitment overfishing, which was identified as the major cause of the population crash in the early 1980s.⁵ The threshold biomass is based on the status of the female spawning stock in 1995, when a broad age structure was documented in the population.⁶ As mentioned above, managing for an expanded age structure in the female population is critical for ensuring successful spawning and recruitment in the long term.

The PID implies that the current target biomass reference point target ($SSB_{1995} \times 1.25$) may be unattainable. We disagree. The 2019 stock assessment found that overfishing has occurred in 13 out of the last 15 years. Furthermore, F_{target} (i.e., the fishing mortality level set to achieve the biomass target) has been exceeded every year since the striped bass stock was declared rebuilt in 1995.⁷ Simply put, the implementation of the reference points and associated control rule has been inadequate. Management has not given the reference points the opportunity to perform so that we can evaluate their efficacy. We support exploring model-based reference points in the next stock assessment. However, until these reference points are available, it is premature to consider revisions.

Issue 3: Management Triggers & Issue 4: Stock Rebuilding Targets and Schedule

By design, the management triggers are meant to achieve the goal and objectives of the ISFMP, which we strongly support as noted above. However, even with these triggers in place, striped bass have declined 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 are recommending that conservation equivalency not be granted when responding to Triggers 1 and 2 (see below). Corrective action should be timely. Two years after striped bass were declared overfished, the fishing public is still waiting

⁴ Richards, R.A. and Rago, P.J. 1999. A Case History of Effective Fishery Management: Chesapeake Bay Striped Bass. *North American Journal of Fisheries Management*, 19: 356-375. [https://doi.org/10.1577/1548-8675\(1999\)019<0356:ACHOEF>2.0.CO;2](https://doi.org/10.1577/1548-8675(1999)019<0356:ACHOEF>2.0.CO;2)

⁵ Shepherd, G., Nelson, G., Rago, P., Richards, A., and Goodyear, P. 2018. A chronicle of striped bass population restoration and conservation in the Northwest Atlantic, 1979–2016. NOAA Technical Memorandum NMFS-NE-246, 51 p.

⁶ See Note 4, p.364, Figure 2.

⁷ Northeast Fisheries Science Center (NEFSC). 2019. 66th Northeast Regional Stock Assessment Workshop (66th SAW) Assessment Summary Report. US Dept Commer, Northeast Fish Sci Cent Ref Doc. 19-01; 40 p. <http://www.nefsc.noaa.gov/publications/>

on the Management Board to specify a rebuilding program that does not exceed 10 years (Trigger 2).

Triggers 1-4 are sound and should remain as is in the ISFMP. However, Trigger 5, meant to avoid recruitment failure, has proven to be an ineffective indicator. Options should be developed in Amendment 7 for a recruitment trigger that better accounts for inter-annual variability. For example, using a rolling 3-year average of a juvenile abundance index (JAI) to detect recruitment failure will be more responsive to declining trends in recruitment. Options for a revised recruitment trigger should include required management responses. The current wording, “will review the cause of recruitment failure (e.g., fishing mortality, environmental conditions, and disease) and determine the appropriate management action,” is too vague to be an effective course corrector.

Issue 5: Regional Management

We are encouraged by the ongoing work to develop the two-stock statistical catch-at-age model that estimates stock-specific characteristics for the Chesapeake Bay stock and the Delaware Bay and Hudson River stocks combined. When complete and approved for management use, the two-stock model could inform a sound regional management program that is better aligned with population dynamics. Until that time, a regional management program should not be undertaken, and the topic should be removed from Amendment 7.

Issue 6: Management Program Equivalency (Conservation Equivalency)

Conservation equivalency is an important issue to address in Amendment 7. We are concerned that permitting conservation equivalency 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 by decreasing removals by 18%.⁸ After the approved conservation equivalency programs were analyzed as a whole, the result was weakened conservation. Addendum VI is predicted to fall short of the 18% reduction goal, achieving only a 15% decrease in coastwide removals.⁹ 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.

Issue 7: Recreational Release Mortality

With an average of 2.8 million striped bass dying after release each year,¹⁰ recreational release mortality comprises a significant portion of total fishing mortality and is an issue that warrants attention. The Addendum VI circle hook requirement, implemented at the start of this year, was an important first step toward reducing post-release mortality, and the effectiveness of this measure should be tracked and reported in the annual interstate fishery management plan

⁸ Atlantic Striped Bass Technical Committee. Memo to the Atlantic Striped Bass Management Board. 28 Jan 2019.

⁹ Appleman, Max. Memo to the Atlantic Striped Bass Management Board. 28. April 2020.

¹⁰ Amendment 7 PID, p. 16.

review. Addendum VI also encouraged angler outreach and education campaigns, and we are pleased that all states on the Management Board have undertaken public awareness initiatives. We support dedicating resources to expand angler education and outreach in order to communicate and garner support for landing, handling and dehooking best practices. Education and outreach should also be geared toward improving the fishing public's understanding of how the environmental factors, such as water temperature, air temperature and salinity, can negatively affect post-release survivability. Options for seasonal closures in areas where a culmination of unfavorable environmental conditions are likely to result in high post-release mortality should also be explored.

Issue 8: Recreational Accountability & Issue 9: Commercial Allocation

Catch accountability and allocation are complex and often contentious issues. While we agree that these issues need to be addressed, we are concerned that doing so through Amendment 7 could lengthen the timeline to develop the amendment. A striped bass rebuilding plan is long overdue, and conservation should be the focus of the Management Board's attention and resources at this time.

Issue 10: Any other issues concerning the management of Atlantic striped bass

Changes in water and air temperature, precipitation and sea-level rise have the potential to affect striped bass productivity, and for these reasons, Atlantic striped bass are ranked as "highly vulnerable" to climate change in the Northeast Fish and Shellfish Climate Vulnerability Assessment.¹¹ While it is beyond the scope of fishery managers to control climate change, information on climate vulnerability can be used to prepare for and help mitigate climate impacts to fish stocks. For instance, the most recent iteration of the Risk and Uncertainty Decision Tool, developed to methodically account for risk and uncertainty in decision-making, provides a matrix demonstrating how the tool could be applied to striped bass. Climate vulnerability information is factored into the score for environmental uncertainty.¹² Climate change impacts on forage distribution and availability, water quality and habitat important to striped bass life history are important topics that warrant exploring through Amendment 7. Options should be presented to account and prepare for these impacts, and research needs should be prioritized.

Thank you for your consideration.

Sincerely,



Pam Lyons Gromen, Executive Director

¹¹ A Vulnerability Assessment of Fish and Invertebrates to Climate Change on the Northeast U.S. Continental Shelf Hare JA, Morrison WE, Nelson MW, Stachura MM, Teeters EJ, et al. (2016) A Vulnerability Assessment of Fish and Invertebrates to Climate Change on the Northeast U.S. Continental Shelf. PLOS ONE 11(2): e0146756. <https://doi.org/10.1371/journal.pone.0146756>

¹² ASMFC Winter 2021 Meeting Materials. Interstate Fisheries Management Program (ISFMP) Policy Board. Draft Risk and Uncertainty Policy.