

## **American Saltwater Guides Association**

### **Our thoughts on Addendum VI to Amendment 6**

Our board met earlier in the week to decide how the association should proceed. Our suggestions are listed below.

You can see our [letter to ASMFC here](#).

We appreciate you taking the time to review this document. We might not line up with your specific thoughts but that's OK. Now, we will get into how we came to our decision. Our approach was simple. We worked hard to make the best decision for the fish. We selected the options that will recover the stock as quickly as possible.

#### **Option 2:**

##### **Equal Percent Reductions**

We are all stakeholders in this fishery. We all benefit from an abundant population of striped bass and we should all shoulder the responsibility of rebuilding the stock equally. ASGA has never taken a position against commercial striped bass fishing. We feel that everyone should want to step up to recover this fishery. In fact, it is disconcerting that commercial fishing doesn't want to take their share of the 18% reduction. Maryland was the only state where the recreational sector overfished after the initial reductions in 2014. While it is true that 90% of the harvest is recreational, that merely signifies that this is a recreational fishery and the economic impact from our sector renders the commercial contributions insignificant on a coastwide scale. The fishery should be managed as a primarily recreational fishery. While we are not anti-commercial, we also feel that if they chose not to give back to a resource in need, they are putting themselves on a political island. Neutral parties will have a hard time defending their failure to shoulder a fair share of the conservation burden.

##### **Sub-Option 2A-1**

###### **1 fish @35" for the Coast Ocean Recreational Fishery**

WE thought long and hard about all the options. There is a ground swell of support for slot limits. There are some complications that we feel can't be overcome at this time with slot limits, as well as some positive aspects to 1@35" that can't be overlooked.

First and foremost, we have to deal with conservation equivalency. In the case of red drum, you cannot harvest a fish over 27" coastwide. What happens when individual states apply for striped bass conservation equivalency? There won't be an effective slot limit unless all states agree on the same upper and lower limit. Our outreach up and down the coast shows that a majority of anglers want one regulation that all states adopt. Since this isn't a possibility, the only option with any hope of success is 1@35". We rebuilt the stock with a similar size and creel limit before, so we know that this approach has a history of success. Furthermore, conservation equivalency severely limits the potential effectiveness of a slot limit. If all states are not *REQUIRED* to adhere to a maximum size, how can a slot limit possibly work?

##### **Sub-Option 2B-1**

## **1 Fish @ 18" for the Chesapeake Bay**

As you are well aware, the recreational sector in Maryland was allowed to grossly overfish because their conservation equivalency proposal was not properly vetted by the Technical Committee. This is the most restrictive and quantifiable option for harvest reductions in the Chesapeake Bay. One fish would also address many of the concerns regarding catch and release mortality.

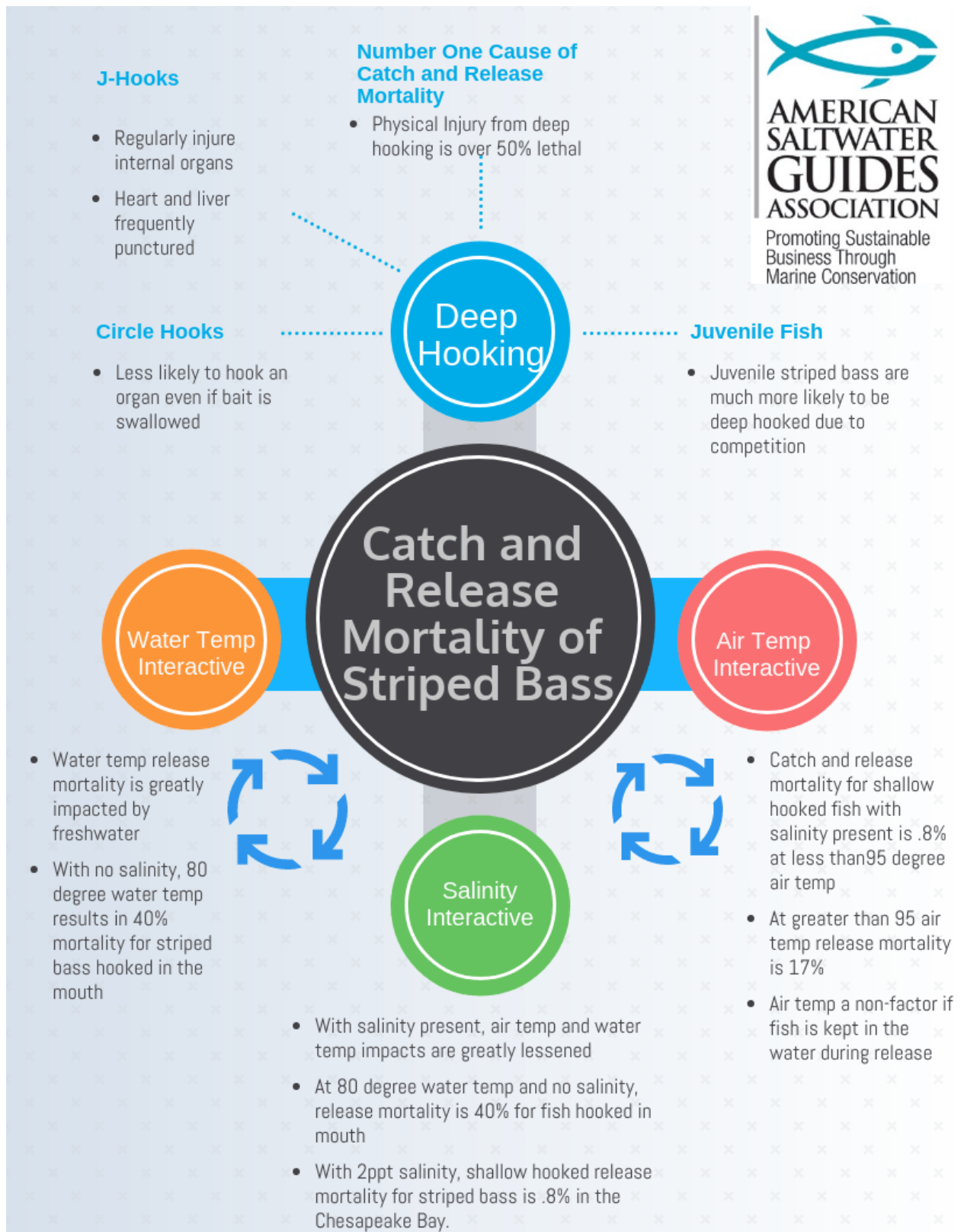
### **Circle Hook Provision**

#### **Option B**

If we are truly concerned about catch and release mortality, and it is not a “red herring” to take the focus away from overharvest, then we must adopt mandatory circle hook regulations. The number one cause of catch and release mortality is deep hooking. Peer reviewed science shows us that circle hooks greatly improve catch and release mortality numbers. We urge the commission to adopt this measure.

Other Issues not addressed in this amendment.

- We do not believe that conservation equivalency is a way to move forward. It has been used to make things look good on paper but does not translate well into real world applications. Case in point, Maryland recreational anglers were allowed to harvest over 200% of their Addendum IV goal via conservation equivalency.
- We believe that a 50/50 probability of success is far too low of a bar. The Mid-Atlantic Council regularly uses higher success models. Striped bass are too important for this standard to be so low.
- We understand there is uncertainty in any fisheries model. However, the current data for this amendment shows that the stock will not be rebuilt until 2033. That is longer than the ten-year timeline laid out in Amendment 6 to the Interstate Fishery Management Plan for Atlantic Striped Bass. In other words, ASMFC is not following their own rules, yet again.
- Catch and release mortality is being used as a “red herring” to shift focus away from harvest reductions. If that isn’t the reason why wasn’t this an issue in 2006 when catch and release mortality was considerably higher? It is because harvest reductions were not on the table then. Certain states/sectors are looking to find any way possible to not take meaningful reductions and will use release mortality as a tool to allow for greater harvest. Furthermore, striped bass anglers are choosing to release more fish. Since the 9% release mortality number is static, the more fish released, the higher the mortality. It is common sense that as the trend grows, release mortality would surpass harvest. We urge the technical committee to reject non-quantifiable conservation equivalency proposals. The number one cause of catch and release mortality is deep hooking. Circle hooks will go a long way in addressing this.



- All of these issues were detailed by ASGA. We did [a comprehensive analysis of striped bass management under ASMFC vs a Magnuson-Stevens structure](#) similar to that governing the

regional councils. The bottom line is that flexibility and lack of accountability are dooming our inshore fisheries. ASMFC needs to be more accountable and have less flexibility. There is an incredible amount of uncertainty in fisheries management. We need to be more cautious with management, considering all the unknowns inherent in this arena.

Striped Bass Management		
Atlantic State Marine Fisheries Commission	VS	Council/Magnuson Stevens Framework
ASMFC does not manage striped bass under annual catch limits for recreational anglers.	<b>Hard Poundage Quota/ ACL</b> 	Annual catch limits aim to end and prevent overfishing. By the end of 2016, only about 8 percent of approximately 390 annual catch limits were exceeded
Actions taken by a state which differ from the requirements of the [fishery management plan], but which achieve the same quantified level of conservation for the resource under management	<b>Conservation Equivalency</b> 	Conservation equivalency is not allowed.
No payback for overfishing. Maryland has exceeded their quota by over 40% with no repercussions	<b>Over fishing Penalty</b> 	Councils, under Magnuson-Stevens, have a payback policy. If one sector in a specific area over fishes, they must payback the quota
ASFMC can change the reference points for striped bass (how many are left in the ecosystem) with arbitrary action.	<b>Changing Reference Points</b> 	Any change in reference points must be supported by sound science
Currently, the suggested 17% reduction only ends over fishing. The reduction does not rebuild the stock.	<b>Rebuilding Plans</b> 	Under Magnuson-Stevens framework, the reductions for striped bass harvest would have to be enough to rebuild stock within 10 years.
The commission can not be sued. There is no recourse for not following the rules.	<b>Accountability</b> 	The councils can be sued if they do not follow the law.
ASMFC management has too many loopholes and no accountability to manage striped bass	<b>Failure</b> 	Legally bound to rebuild stock and end over fishing. This style of management has a proven track record of stabilizing populations.
Information provided by The American Saltwater Guides Association		

We strongly encourage you to send in your own letter. Form letters are not very effective, so please, personalize your message.

ASMFC will receive thousands of emails. In order for the emails to be counted, ASMFC is asking that we use the following procedure:

**Atlantic States Marine Fisheries Commission**

**Comment Deadline October 7, 2019 5 p.m.**

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

**Subject: Striped Bass Draft Addendum VI**

**Or Mail to:**

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