



ASA Guide to the Public Information Document for Striped Bass Amendment 7

Background

- A 2019 scientific stock assessment concluded that the striped bass population is overfished and experiencing overfishing, meaning the population is in a poor condition.
- In 2020, the Atlantic States Marine Fisheries Commission (ASMFC) implemented an 18% reduction in the fishery to end overfishing and begin rebuilding the striped bass population and its fishery.
- In early 2021, as a follow up management action, ASMFC initiated Amendment 7 to the Fishery Management Plan which will reconsider several management issues for striped bass.
- The first step in the Amendment process is a Public Information Document (PID) and ASA is creating this guide to help stakeholders think through the issues and engage in this process.
- The overarching theme for a PID is to share ideas with ASMFC so that they have a complete set of management tools to choose from when they develop the Amendment after which another round of input will occur.
- To provide a fishing analogy, think of the PID as an empty tackle bag. At this first stage, we are just trying to make sure ASMFC has all the right tackle in the bag, at a later stage we will make recommendations on which specific lures to use.

Guidance on Management Issues Included in the PID – Use this guide in combination with [ASMFC's PID](#). We make bulleted suggestions to briefly outline initial thoughts on each management issue but encourage you to also share your ideas with ASMFC on each management topic. Attend a [virtual public hearing](#) or email: comments@asmfc.org by April 9, 2021.

1. Fishery Goals and Objectives – This section guides the management program for striped bass. The current goals and objectives from Amendment 6 (outlined in the [PID](#)) provide a strong foundation for striped bass management. The overarching question is how do you want the striped bass fishery to look moving forward? We provide a few examples below to help facilitate ideas on fishery goals and objectives.

ASA's take:

- 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) – BRPs are the goalposts that are used to evaluate the status of the population and indicate when a management change needs to occur in the fishery. Think of them as speed limits. Currently, they are empirical, based on the observed level of the population in 1995, the year striped bass was declared rebuilt. In the absence of model based BRPs, the overarching question is, are the empirical BRPs adequate to sustain a healthy population and achieve the fishery goals and objectives or should they be changed?

ASA's take:

- We support the current BRPs because they are adequate to achieve the current fishery goals and objectives especially considering that under these BRPs, the fishery and population were healthy in the mid-2000s.
- If alternative BRPs are considered in Amendment 7, then we request that the Technical Committee conduct an analysis of those 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 – These are a unique aspect to the striped bass fishery management plan. They require management response in addition to the typical corrective actions to end overfishing and rebuild an overfished stock. Some of the triggers currently used are based on different combinations of fishing mortality (F)¹ and spawning stock biomass (SSB)², while others are based on low recruitment levels. Management triggers are 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.

ASA's take:

- 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 – It is important to note that fisheries science is not an exact science. We touched on this in issue 3, but it is germane in issue 4. [Figure 1 in the PID](#) shows just how sensitive changes in data and modeling can have on our understanding of the population and its BRPs. The way fisheries management works is if we maintain F at the target level, we can achieve the SSB target level over time, meaning the BRPs are linked. However, F is not the only factor influencing the ability of striped bass to rebuild. History tells us that recruitment (numbers of baby striped bass born on a given year) 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.

ASA's take:

- 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.
- Consider stocking of hatchery-raised fish from wild brood stock in major producer areas if recruitment continues to be poor.
- 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 discussion 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 we can find regulations that maintain F consistently at its target.

¹ Fishing Mortality (F) is defined as the rate at which fish die due to fishing.

² Spawning Stock Biomass (SSB) is defined as the poundage of spawning adult females in the population.

ASA's take:

- 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. So why is it a problem now? As discussed, the population is in need of conservation and any way that we can reduce mortality on striped bass will be beneficial even if we cannot scientifically measure that benefit. As a result, ASA worked with On The Water Media to develop education and outreach materials for best handling practices and the use of circle hooks that the states could use to help educate their angling communities. We are focusing on education and outreach to address release mortality because this issue is difficult to control through regulation other than the circle hook requirement already implemented. All anglers play a role in increasing the survivability of released striped bass so check out our education materials [here](#).

ASA's take:

- 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 fishermen 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 harvest survey designs and/or improper regulations; neither of which are the fault of recreational fishermen. As discussed in issues 5 and 6, 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.

ASA's take:

- 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 – As discussed, many times in this guide, the resource is in need of conservation. 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.

ASA's take:

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

10. Other Issues – This section is used to provide ASMFC with ideas that are not covered by the formal topics included in the PID. Share any ideas outside of those covered in issues 1-9.

ASA's take:

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