



October 15, 2024

Emilie Franke
Striped Bass FMP Coordinator
Atlantic States Marine Fisheries Commission
1050 N Highland Street, Suite 200
Arlington, VA 22201

RE: ASGA Comments for October 2024 Striped Bass Board Meeting, Rebuilding

Dear Ms. Franke and Striped Bass Board Members,

ASGA represents conservation-minded fishing guides, private anglers, and fishing businesses that believe in "Better Business through Conservation." Despite the difficulties ahead, ASGA remains focused on rebuilding the Atlantic striped bass stock by 2029.

After attending multiple Striped Bass Technical Committee and Scientific and Statistical Committee meetings, we have deep concerns that no action will be taken at the October Annual Meeting. There is an extremely wide range of rebuilding options, from a 4% to almost 50% reduction. Both of which result in a "coin toss" 50% chance of rebuilding the stock. The one reliable constant of striped bass management is the Juvenile Abundance Index. Currently, the JAI paints a very bleak picture. Even if Maryland has a slightly better JAI in 2024, we still must contend with no less than 5 vacant year classes. Without clear direction from the SAS or TC, this lack of juvenile abundance should guide all Boards decisions.

ASGA strongly opposed the current slot because we knew it would decimate the 2015-year class, which was once the 8th-best on record. This slot resulted in a 39% and 17% increase in fishing mortality in 2022 and 2023, respectively. Because of this slot implementation, we face an almost impossible rebuilding task.

Prior to initiating the slot, ASGA submitted a letter signed by several thousand anglers, private business owners and industry brands expressing their commitment to resource-first management. During the subsequent Board meeting, not one word was mentioned about the conservation community's position. Instead, the ill-advised slot was approved, and the 2015-year class was severely damaged.

This lack of foresight with slot choice is a single example of a long list of catastrophic failures from this Board over the last twelve years. We appreciate the Commissioners who have fostered some conservation-focused actions in recent years. Unfortunately, it wasn't enough. This Board has failed a multi-billion-dollar industry just to benefit a vocal minority while minimizing the value of a healthy, abundant resource.

The evident lack of direction for the Board will open the door to "kick the can down the road" yet again. We will hear Board members say that we need more data or request to start an amendment process. The public empowered this Board to make hard decisions at this meeting without the time delay of formalized public comment. That decision exhibited an enormous

amount of trust on our part. The only reason this Board would stall significant action is to buy time to exploit the 2018-year class, which is entering the slot, as was done with the 2011 and 2015-year classes.

Our community has communicated the science, educated the public, and vehemently supported striped bass conservation with integrity every step of the way. The striped bass conservation community expects the Board to move forward with equitable, enforceable, and science-based management options.

ASGA Input for Potential Management Options:

- Reductions must be equal across sectors. Commercial reductions must be made from harvest, not quota. Many jurisdictions have not hit their quota. Therefore, taking a reduction off the quota is only a reduction on paper. It does not result in less mortality and will not help recover striped bass.
- Direct statements on the record from the Law Enforcement Committee (LEC) consistently state that no targeting closures are entirely unenforceable. The LEC rated non-targeting closures the least enforceable of 27 guidelines and gave them a 1.87 out of 5 enforceability rating, making them utterly ineffective at reducing effort. Non-targeting closures are not equitable across the coastwide range of striped bass. Some states have much shorter seasons. Guides' businesses will also be unfairly impacted. Business has been hard enough for our members. Taking away more time on the water could end their businesses altogether.
- No harvest closures should be initiated for the 2025 season. Unlike no-targeting closures, these will have a measurable impact and are enforceable.
- Each jurisdiction should have the same percentage reduction applied to the harvest numbers for that jurisdiction. As we have seen in the past, a "coastwide" reduction would significantly impact states with shorter seasons. New Jersey cheated a reduction in the past by using this loophole. If this happens again, the Board will display its inability to learn from mistakes.
- Commercial fishing in the Chesapeake Bay and anchored gill net fisheries that intercept fecund striped bass entering their spawning estuaries must be curtailed. The striped bass commercial fishery in Maryland has not taken a reduction in over a decade while the Maryland recreational fishery has almost collapsed. It is illogical that approximately 80% of commercial landings come from Maryland while the estuary is experiencing 5 (potentially 6) years of spawning failure. This harvest, not quota, must be heavily reduced. The anchored gill net fisheries in Virginia and Delaware are no longer sustainable, considering the repeated spawning failures in both estuaries. Recreational effort has been grossly overestimated by NOAA. That means that commercial striped bass harvest is a much higher percentage of total harvest than previously estimated.

Some place blame on habitat loss and climate change. Especially if these aspects are the root cause of failed spawning, we must be more conservative and risk-averse in management. This Board doesn't manage climate change. This Board manages fishery regulations. The same

conservation message holds if the root cause is overfishing for 21 of the last 24 years as documented in the data.

Striped bass are the most important recreational fishery on the Atlantic coast, supporting countless coastal communities, small businesses, and fishing brands. Beginning in 2012, the Striped Bass Management Board has made a litany of bad decisions and allowed bad actors to abuse the resource. We applaud the voices for conservation on the Board. The American Saltwater Guides Association will continue to support their efforts. This Board must recognize 5 years of failed spawns. Further damaging the resource and the economy through Board actions that look good only on paper is unacceptable to the striped bass conservation community.

The undersigned organizations, guides, fishing businesses, and conservation-minded recreational anglers who depend on a healthy striped bass stock deserve better. Striped bass deserve better. If there is no action at the October Annual meeting, we will lose all faith in this body's ability to fulfill their obligation to rebuild this stock and manage striped bass effectively.

On behalf of striped bass,

A handwritten signature in black ink, appearing to read 'Tony Friedrich', with a stylized flourish at the end.

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