

Proposed VSSA Response for Draft Amendment 7 Public Comment
Atlantic Striped Bass Fishery Management Plan
Pre-Public Hearings 2/29/22

Following are the proposed VSSA positions on each questions contained in the Striped Bass Amendment 7 Public Information Document. Due to the previous inaction from the Striped Bass Management Board, VSSA believes immediate action is called for in rebuilding the Striped Bass population and supports the most conservation-oriented positions. There are four main areas for public comment, each with a number of options and sub options: 1. Management Triggers, 2. Recreational Release Mortality, 3. Rebuilding Plan, 4. Management Program Equivalency (aka Conservation Equivalency or CE). The questions posed can be found in detail on pages 44 through 55 of the Public Information Document (PID) located here: http://www.asmfcr.org/uploads/file/61fd9572AtlStripedBassDraftAm7forPublicComment_Feb2022.pdf

MANAGEMENT TRIGGERS – Section 4.1

Tier 1 Fishing Mortality Triggers - VSSA believes we should maintain the Status Quo on the existing Management Triggers. Accordingly, VSSA supports:

- Option A1: status quo - Reduce F to a level that is at or below the target within one year.
- Option B1: status quo - Reduce F to a level that is at or below the target within one year
- Option C1: status quo - If F exceeds the F target for two consecutive years... the striped bass management program must be adjusted to reduce F to a level that is at or below the target within one year.

Tier 2-Female Spawning Stock Biomass (SSB) Management Triggers – implements a 2-year deadline to act and forces a 10-year rebuilding plan (no more kicking the can down the road).

- Option A2: VSSA supports a 2-year deadline to implement a rebuilding plan. The Board must implement a rebuilding plan within two years from when an SSB-based management trigger is tripped.
- Option B1: VSSA supports the status quo
- Option C1: VSSA supports the status quo

Tier 3-Recruitment Triggers – VSSA supports using trigger alternative with higher sensitivity.

- Option A3: The recruitment trigger is tripped when any of the four JAIs... is below the median of all values... This would have been triggered 6 times since 2003.
- Option B2: If the recruitment trigger is tripped...F target must be reduced within one year

Tier 4- Deferred Management Actions. VSSA believes immediate action is required (no more kicking the can down the road).

- Option A: No deferred action if any trigger is tripped.

RECREATIONAL RELEASE MORTALITY- Section 4.2.2 VSSA supports both effort controls (seasonal closures) and gear restrictions.

- Option A: VSSA supports the status quo (circle hook measures)
- Option B1: limited support – State Specific Two-Week Closures. VSSA notes two weeks may or may not be enough. For example, VSSA believes the current two-week closure is woefully inadequate in Maryland during the warm summer months.
- Option B2: VSSA supports – Effort Closures in Spawning Area for both Recreational and Commercial Harvest. Additionally, VSSA strongly believes there should be additional restrictions placed on the commercial harvest of pre-spawn Striped Bass. We are not saying reduce the commercial quota. We advocate moving the harvest to non-pre-spawn months.
- Option C1: VSSA supports - Additional Gear Restrictions – permit only non-lethal devices for removing fish.
- Option C2: VSSA supports - Additional Gear Restrictions – any fish caught on any unapproved method must be returned to the water
- Option D1: VSSA supports – Outreach and Education – States are required to develop public education and outreach campaigns

REBUILDING PLAN – Section 4.4.1

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- Option B: VSSA supports rebuilding the female SSB no later than 2029 using the low recruitment regime assumption and understands that may result in more restrictive management measures

4.4.2 Rebuilding Plan Framework

- Option B: VSSA supports permitting the Management Board to take action in response to 2022 benchmark assessment without having to go through an amendment or public comment period.

MANAGEMENT PROGRAM EQUIVALENCY – 4.6.2 aka Conservational Equivalency (CE) VSSA believes Conservation Equivalency should not be allowed or used when the fishery is overfished and overfishing is occurring. Not allowing CE was not one of the options presented. Accordingly, VSSA supports:

- Sub-Option B1a: VSSA supports no CE when the stock is at or below the biomass threshold.
- Sub-Option B1c: VSSA supports no CE when the fishing mortality is at or above the fishing mortality threshold.
- Sub-Option B2b: VSSA supports no Quota managed recreational fisheries (e.g., bonus programs)
- Sub-Option C3: VSSA supports Default Precision Standards for MRIP Estimates – 30%
- Sub-Option D3: VSSA supports Default CE uncertainty buffer non-quota managed fisheries – 50%
- Sub-Option E2: VSSA supports Percent reduction at the state-specific level

As additional information, if CE is allowed, VSSA believes payback should be required in the following year for any state not meeting the objectives set in any approved CE proposal.

Public comment was not requested on the following section:

5.6.1 Spawning Area Closures (Pg 89 of the PID)

Consideration should be given to the prohibition of fishing on the spawning grounds during the spawning season. In addition to the mandatory spawning closures [if selected in Section 4.2.2; delete if not-selected], states are encouraged to maintain existing spawning closures and evaluate the need for additional spawning closures.

VSSA Comment on Section 5.6.1

VSSA firmly believes if any area is closed for any reason, neither recreational nor commercial fishing should be allowed in that area. If one sector (recreational or commercial) is not allowed to harvest during any period, neither sector should be allowed to harvest. Moreover, VSSA believes the Spawning areas should be closed pre spawn to both Recreational and Commercial harvest. We are not advocating Commercial quota be reduced; we advocate the harvest effort be shifted away from the pre spawning period.