



December 10, 2024

Emilie Franke
ASMFC Fishery Management Plan Coordinator
1050 North Highland Street, Suite 200A-N
Arlington, Virginia 22201

Dear Ms. Franke,

On behalf of the Congressional Sportsmen's Foundation, thank you for the opportunity to provide comments on the Atlantic Striped Bass Updated Projections and 2025 Management Considerations. The Atlantic States Marine Fisheries Commission (ASMFC) and its member states should be commended for the recent difficult choices that have effectively ended overfishing of Atlantic striped bass and allowed the fishery to continue a rebuilding trajectory. As such, we urge you not to make any changes to the current management measures for the following reasons:

- The Marine Recreational Information Program (MRIP) on which much of the assessment and projections are based is unreliable and likely overestimating recreational catch by as much as 40%. A pilot study by the National Marine Fisheries Service (NMFS) is currently underway to account for this known inflation bias that was announced by NMFS in 2023.
- Whether using MRIP Waves 2-3 or Waves 2-4, the most recent stock assessment update clearly indicates that we are fishing at a sustainable $F_{rebuild}$ but likely even lower, which supports that management measures already in place are effective at reducing removals and the current fishing effort will not prohibit stock rebuilding.
- With only two years of fishing under the current emergency restrictions, which have accomplished the necessary reductions to end overfishing, any additional restrictions or burdens on the recreational fishing community is unwarranted and would be difficult to evaluate their effectiveness above and beyond what is already in place.
- The Atlantic striped bass population has only exceeded the spawning stock biomass (SSB) target in four of the last 41 years, calling into question whether this theoretical target has been set too high, especially given the reality of changing ocean conditions over the course of the last four decades.
- Chronic low recruitment in recent years, particularly in the Chesapeake Bay, may continue indefinitely due to changing environmental conditions, which were recently documented by the Maryland Department of Natural Resources. Further reducing recreational fishing opportunities is not a solution for environmental pressures on recruitment.

- Adding additional restrictions on the recreational fishing community would result in substantial social and economic impacts. Striped bass are the most popular sportfish along much of the Atlantic. The more than 7 million anglers in this fishery support thousands of businesses, some of which have already felt the negative impacts of the recent emergency restrictions that are in place. The current upward trend in stock rebuilding combined with the significantly reduced fishing mortality do not justify further economic harm or lost days on the water for anglers.

We appreciate the extensive amount of effort by the Striped Bass Technical Committee (TC) and Stock Assessment Subcommittee (SAS) in developing the detailed range of management options to realize further reductions in fishing mortality. However, given that the current fishing mortality rate is the lowest it has been in 30 years and the continued increase in SSB towards the SSB target, changes in the current management of the recreational sector are not necessary.

We strongly support the ASMFC maintaining the status quo in the striped bass seasons and regulatory structures.

Sincerely,

A handwritten signature in cursive script that reads "Chris Horton".

Chris Horton
Senior Director, Fisheries Policy