



October 3, 2025

Emilie Franke
Fishery Management Plan Coordinator
Atlantic States Marine Fisheries Commission
1050 North Highland Street, Suite 200
Arlington, Virginia 22201

Dear Ms. Franke:

On behalf of the Congressional Sportsmen's Foundation (CSF), we write to express support for proposed management revisions in Sections 3.1-3.3 of the Draft Addendum III to Amendment 7 of the Interstate Fishery Management Plan for Atlantic Striped Bass. However, we are strongly opposed to the unnecessary reduction in fishing opportunities proposed in Section 3.4.

3.1 Method to Measure Total Length of a Striped Bass

We support Option B, which standardizes how striped bass are measured for regulatory compliance across all states, ensuring fairness and enforceability. The current patchwork approach and ambiguity in how striped bass are measured among jurisdictions creates unnecessary challenges for anglers, enforcement officers, and expected outcomes of length-based conservation measures.

3.2 Commercial Tagging: Point of Tagging

We support Option B, tagging fish at the point of harvest. Fish caught that are to be sold by commercial fishermen should be clearly identified as such when brought onboard the fishing vessel. Doing so will aid enforcement of commercial quotas and increase accountability within the sector.

3.3 Maryland Chesapeake Bay Recreational Season Baseline

We support Option B, which keeps Maryland's striped bass removals at 2024 levels, provides more angling opportunities in the spring, reduces post-release mortality concerns in the summer months, better aligns with Marine Recreational Information Program (MRIP) waves, and provides better clarity for anglers and enforcement authorities. Adjusting the Maryland baseline as proposed in Option B effectively balances angler access with striped bass conservation needs.

3.4 Reduction in Fishery Removals to Support Stock Rebuilding

We strongly support Option A (Status Quo) and oppose any reduction in fishing effort beyond the highly restrictive and effective measures already in place. The striped bass fishery is one of the most important recreational fisheries along the Atlantic coast, both culturally and economically. For decades, anglers have willingly shouldered their conservation responsibility for sustaining healthy striped bass fisheries, and the most recent implementation of narrow slots and reduced creel limits have successfully minimized fishing mortality (F) to a 30-year low, well below both the F target and

threshold. The proposed 12% additional reduction in fishing mortality is likely unmeasurable, unnecessarily punitive, and simply not warranted at this time.

Section 3.4 is a pivotal component of Draft Addendum III that will have significant ramifications for anglers, the fishing industry, and local economies, and we offer the following rationale for maintaining status quo.

Striving to Achieve Precise Estimates Using Highly Imprecise MRIP Data Is Unsound

The proposed 12% reduction stems from a 0.01 difference between the 2024 MRIP-derived fishing mortality estimate and the current estimated fishing mortality rate to achieve rebuild by 2029 ($F_{\text{rebuild}} = 0.12$ vs. $F_{2024} = 0.13$). Given the overlap of confidence intervals generated by model estimates, an additional 12% reduction in F will likely be statistically indistinguishable from status quo. Essentially, Section 3.4 of Draft Addendum III seeks to shift the burden of MRIP uncertainty onto anglers, while neither the no-targeting nor the no-harvest closures proposed to achieve the reduction would meaningfully improve striped bass conservation.

Outdated Rebuilding Assumptions

The rebuilding plan continues to assume that environmental conditions and striped bass carrying capacity in the Chesapeake Bay remain the same today as they were in 1995. Recruitment indices alone over the last two decades make that assumption difficult to justify. Habitat, forage availability, water quality, and broader ecosystem dynamics have undoubtedly shifted over the last 30 years, directly influencing the Bay's ability to support spawning success and recruitment.

Furthermore, the 10-year rebuilding timeline is arbitrary and likely not appropriate given striped bass life history. As such, it seems unreasonable to propose punitive management actions that seek a very minimal reduction in the estimated F rate that will only slightly increase the theoretical probability that the stock can be rebuilt in a subjective 10-year deadline, especially given that the adult population is already experiencing a positive trajectory under the current regulatory framework. Rebuilding strategies to meet arbitrary goals that do not reflect current environmental realities risk setting managers and anglers alike up for failure.

Higher Spawning Stock Biomass \neq Higher Recruitment

Poor recruitment in the Chesapeake Bay is largely driven by environmental factors, not fishing effort. History shows that strong year classes have occurred at low spawning stock biomass (SSB) levels, and conversely, low recruitment has often followed years with very high SSB, suggesting that recruitment is not directly tied to fishing activity or the SSB. With fishing mortality already at a 30-year low, additional restrictions will not address the underlying issue of poor recruitment.

Fishing Effort is Self-Regulating

Recreational fishing effort tends to mirror population abundance. When fish abundance is high, more anglers participate and effort increases. Conversely, when fish abundance is low, angler interest and effort generally decline. Striped bass fishing effort is currently at its lowest level in

decades. This fact demonstrates that angler behavior is likely already adjusting in concert with recent poor recruitment, reducing removals without the need for additional blunt regulatory measures.

Conclusion

We fully support the management actions proposed in Sections 3.1 – 3.3, which will provide better clarity, accountability, and enforceability to the management of striped bass. However, we feel strongly that additional restrictions to reduce fishing opportunities presented in Section 3.4 is a solution in search of a problem. The current management framework is working – fishing mortality is at historic lows and the tools already in place are propelling the fishery toward the rebuilding target. Draft Addendum III's proposed 12% reduction is an unnecessary and inequitable measure that will not produce quantifiable biological gains but will result in significant economic and social costs. CSF strongly urges the ASMFC to maintain the current striped bass recreational season structure.

Thank you for your consideration of this critical issue and for your continued commitment to science-based, pragmatic fisheries management.

Sincerely,

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

Chris Horton
Congressional Sportsmen's Foundation