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April 12, 2022

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

Re: Atlantic Striped Bass Draft Amendment 7

Dear Ms. Franke,

Thank you for the opportunity to comment on Draft Amendment 7 to the Interstate Fishery Management Plan for Atlantic Striped Bass. Save The Bay supports management measures that are protective of existing striped bass populations and are likely to encourage rebuilding and stock stability. Below, please find the specific management options that our organization supports:

4.1 Management Triggers

Tier 1: Fishing Mortality (F) Triggers

Option A: Timeline to Reduce F to the Target
Save The Bay supports **Sub-option A1** (status quo)

Option B: F Threshold Triggers
Save The Bay supports **Sub-option B1** (status quo)

Option C: F Target Triggers
Save The Bay supports **Sub-option C1** (status quo)

Tier 2: Spawning Stock Biomass (SSB) Triggers

Option A: Deadline to Implement a Rebuilding Plan
Save The Bay supports **Sub-option A2: Two-Year Deadline to Implement a Rebuilding Plan**

Option B: SSB Threshold Trigger
Save The Bay supports **Sub-option B1** (status quo)

Option C: SSB Target Trigger
Save The Bay supports **Sub-option C1** (status quo)

Tier 3: Recruitment Triggers

Option A: Recruitment Trigger Definition
Save The Bay supports **Sub-option A2: The recruitment trigger is tripped when any of the four JAIs used in the stock assessment model to estimate recruitment (NY, NJ, MD, VA)11 shows an index value that is below 75% of all values**

(i.e., below the 25th percentile) in the respective JAI from 1992- 2006, which represents a period of high recruitment, for three consecutive years.

Option B: Management Response to Recruitment Trigger

Save The Bay supports **Sub-option B2**: If the recruitment trigger is tripped, an interim F target calculated using the low recruitment assumption is implemented, and if F from the terminal year of the most recent stock assessment is above the interim F target, the striped bass management program must be adjusted to reduce F to the interim F target within one year.

Tier 4: Deferred Management Action

Save The Bay supports **Option A** (status quo)

4.2.2 Measures to Address Recreational Release Mortality

Option B. Effort Controls (Seasonal Closures)

Save The Bay **does not support** seasonal closures in Amendment 7.

Option C. Additional Gear Restrictions

Save The Bay supports **Sub-option C1**: Recreational anglers would be prohibited from using any device other than a nonlethal device to remove a striped bass from the water or assist in the releasing of a striped bass.

Save The Bay supports **Sub-option C2**: Striped bass caught on any unapproved method of take would be returned to the water immediately without unnecessary injury.

Option D. Outreach and Education

Save The Bay supports **Sub-option D2**: It is recommended states continue to promote best striped bass handling and release practices by developing public education and outreach campaigns.

4.4 Rebuilding Plan

4.4.1 Recruitment Assumption for Rebuilding Calculation

Save The Bay supports **Option B**: Rebuild female SSB to the SSB target level by no later than 2029. F rebuild is calculated to achieve the SSB target by no later than 2029 using the low recruitment regime assumption as identified by the change point analysis.

4.4.2 Rebuilding Plan Framework

Save The Bay supports **Option B**: If the 2022 stock assessment results indicate the Amendment 7 measures have less than a 50% probability of rebuilding the stock by 2029 (as calculated using the recruitment assumption specified in Amendment 7) and if the stock assessment indicates at least a 5% reduction in removals is needed to achieve F rebuild, the Board may adjust measures to achieve F rebuild via Board action.

4.6.2 Management Program Equivalency

Option B. Restrict the Use of Conservation Equivalency (CE) Based on Stock Status

Save The Bay supports **Sub-option B1-a**: CE programs would not be approved when the stock is at or below the biomass threshold (i.e., overfished). CE programs would not be considered until a subsequent stock assessment indicates stock biomass is above the threshold level.

Option C. Precision Standards for MRIP Estimates Used in Conservation Equivalency Proposals

Save The Bay supports **Sub-option C3**: CE proposals would not be able to use MRIP estimates associated with a PSE exceeding 30.

Option D. Conservation Equivalency Uncertainty Buffer for Non-Quota Managed Fisheries

Save The Bay supports **Sub-option D2**: Proposed CE programs for non-quota managed fisheries would be required to include an uncertainty buffer of 25%. *Save The Bay is not opposed to Sub-option D1 if all other preferred rebuilding measures are adopted.*

Option E. Definition of Equivalency for CE Proposals with Non-Quota Managed Fisheries

Save The Bay supports **Sub-option E2**: Proposed CE programs would be required to demonstrate equivalency to the percent reduction/liberalization projected for the FMP standard at the state-specific level.

Thank you for considering Save The Bay's comments and preferred alternatives. We appreciate the hard work of the Commissioners, FMP staff, and all those who have helped craft these critically-important management measures.

Sincerely,



Michael Jarbeau
Narragansett Baykeeper, Save The Bay